

HARMONY GROVE VILLAGE

APPENDIX A

NOTICE OF PREPARATION (NOP) AND COMMENTS TO THE NOP

VTM 5365; GPA 04-04; MUP 04-012, MUP 04-013, and MUP 04-014;
REZ 04-010; SP 04-03; Log No. 04-08-011; SCH No. 2004071004

for the

DRAFT ENVIRONMENTAL IMPACT REPORT
AUGUST 2006

**Notice of Completion and Environmental
Document Transmittal Form**

See NOTE Below

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044--916/445-0613

SCH # _____

1. **Project Title:** Harmony Grove Village; LOG NO. 04-08-011; SP 04-03; GPA 04-04; REZ 04-010; TM 5365; P04-012; P04-013; P04-014

2. **Lead Agency:** San Diego County, DPLU

3. **Contact Person:** Kristin Blackson

3a. **Street Address:** 5201 Ruffin Road, Suite B

3b. **City:** San Diego

3b. **County:** San Diego County

3d. **Zip:** 92123-1666

3e. **Phone:** (858) 694-3012

Project Location 3 miles west of Interstate 15, approximately 2 miles south of SR-78

4. **County:** County of San Diego

4a. **City/Community:** North County Metro

4b. **Assessor's Parcel Nos.** 235-031-02, 05, 06, 07, 08, 09, 10, 11, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38 ; 235-032-27, 28 ; 222-101-03, 05 ; 232-013-04, 05 ; 232-500-09, 11 ; 235-010-16, 17, 21, 22 ; 235-011-01, 02

4c. **Section:** 30 **Twp:** 12S/02W

Range: San Bernardino Meridian

5a. **Cross Streets:** Harmony Grove Road/Country Club Road

5b. **For Rural, Nearest Community:** _____

6. **Within 2 Miles:** a. **State Hwy #:** 15

b. **Airports:** _____

c. **Railways:** None

c. **Waterways:** _____

7. Document Type

CEQA: 01. ☒ **NOP**

05. ☐ **Supplemental/Subsequent EIR**
(Prior SCH No.: _____)

NEPA: 09. ☐ **NOI**

OTHER: 13. ☐ **Joint Document**

02. ☐ **Early Cons**

10. ☐ **FONSI**

14. ☐ **Final Document**

03. ☐ **Neg Dec**

06. ☐ **NOE**

11. ☐ **Draft EIS**

15. ☐ **Other** _____

04. ☐ **Draft EIR**

07. ☐ **NOC**

12. ☐ **EA**

08. ☐ **NOD**

8. Local Action Type

01. ☐ **General Plan Update**

05. ☐ **Annexation**

09. ☒ **Rezone**

12. ☐ **Waste Mgmt Plan**

02. ☐ **New Element**

06. ☒ **Specific Plan**

10. ☒ **Land Division (Subdivision, Parcel Map, Tract Map, etc.)**

13. ☐ **Cancel Ag Preserve**

03. ☒ **General Plan Amendment**

07. ☐ **Community Plan**

11. ☒ **Use Permit**

14. ☐ **Reclamation Plan**

04. ☐ **Master Plan**

08. ☐ **Redevelopment**

9. Development Type

01. ☒ **Residential: Units** 742 **Acres** 468

07. ☐ **Mining: Mineral** _____

02. ☐ **Office:** **Sq. Ft.** _____ **Acres** _____ **Employees** _____

08. ☐ **Power:** **Type** _____ **Watts** _____

03. ☒ **Shopping/Commercial** **Sq. Ft.** 40,000

Employees _____

04. ☐ **Industrial:** **Sq. Ft.** _____ **Acres** _____ **Employees** _____

09. ☒ **Waste Treatment: Type** Waste Treatment Plant

05. ☐ **Water Facilities:** **MGD** _____

10. ☐ **OCS Related**

06. ☐ **Transportation:** **Type** _____

11. ☐ **Other:** _____

10. Total Acres 468

11. Total Jobs Created _____

12. Project Issues Discussed in Document

01. ☒ **Aesthetic/visual**

09. ☒ **Geologic/Seismic**

17. ☐ **Social**

25. ☒ **Wetland/Riparian**

02. ☒ **Agricultural Land**

10. ☐ **Jobs/Housing Balance**

18. ☒ **Soil Erosion**

26. ☒ **Wildlife**

03. ☒ **Air Quality**

11. ☒ **Minerals**

19. ☐ **Solid Waste**

27. ☒ **Growth Inducing**

04. ☒ **Archaeology/Historical**

12. ☒ **Noise**

20. ☒ **Toxic/Hazardous**

28. ☒ **Incompatible Land Use**

05. ☐ **Coastal Zone**

13. ☒ **Public Services**

21. ☒ **Traffic/Circulation**

29. ☒ **Cumulative Effects**

06. ☐ **Economic**

14. ☐ **Schools**

22. ☒ **Vegetation**

30. ☐ **Dark Skies**

07. ☒ **Fire Hazard**

15. ☒ **Septic Systems**

23. ☒ **Water Quality**

31. ☐ **Public Health and**

08. ☒ **Flooding/Drainage**

16. ☒ **Sewer Capacity**

24. ☒ **Water Supply**

Safety

13. Funding (approx.) **Federal** \$None

State \$None

Total \$None

14. Present Land Use and Zoning: Land Use Designation: (17) Estate Residential, (18) Multiple Rural Use, (19) Intensive Agriculture, (24) Impact Sensitive Area, (24) Impact Sensitive/Extractive. Zoning: (A-70) Limited Agriculture, (A-72) General Agriculture, (S-82) Extractive Use.

15. Project Description: Mixed-use, rural residential village consisting of residential uses, commercial uses, open space and park and recreational uses, a sewer package treatment plant and various equestrian facilities including an equestrian ranch for horse boarding and lessons. The project application includes a Specific Plan, a Vesting Tentative Map and three Major Use Permits (MUPs). One MUP is being proposed for the Private Equestrian Ranch (PER), one MUP is proposed for the Wastewater Treatment Facility, and the third MUP is proposed for the remainder of the project site (e.g., residential, commercial, recreation).

16. Signature of Lead Agency Representative Kell M

Date 6/29/04

NOTE: Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g., from a Notice of Preparation or previous draft document), please fill it in.

Reviewing Agencies

- | | |
|---|---|
| <input checked="" type="checkbox"/> Resources Agency | <input checked="" type="checkbox"/> Caltrans District <u>11</u> |
| <input type="checkbox"/> Boating & Waterways | <input checked="" type="checkbox"/> Dept. Of Transportation Planning |
| <input checked="" type="checkbox"/> Conservation | <input type="checkbox"/> Aeronautics |
| <input checked="" type="checkbox"/> Fish and Game | <input type="checkbox"/> California Highway Patrol |
| <input type="checkbox"/> Forestry | <input type="checkbox"/> Housing and Community Dev't |
| <input type="checkbox"/> Colorado River Board | <input type="checkbox"/> Statewide Health Planning |
| <input checked="" type="checkbox"/> Dept. Water Resources | <input type="checkbox"/> Health |
| <input type="checkbox"/> Reclamation | <input checked="" type="checkbox"/> Food and Agriculture |
| <input checked="" type="checkbox"/> Parks & Recreation | <input checked="" type="checkbox"/> Public Utilities Commission |
| <input checked="" type="checkbox"/> Office of Historic Preservation | <input checked="" type="checkbox"/> Public Works |
| <input checked="" type="checkbox"/> Native American Heritage Commission | <input type="checkbox"/> Corrections |
| <input type="checkbox"/> S.F. Bay Cons & Dev't Commission | <input type="checkbox"/> General Services |
| <input type="checkbox"/> Coastal Commission | <input type="checkbox"/> OLA |
| <input type="checkbox"/> Energy Commission | <input type="checkbox"/> Santa Monica Mountains |
| <input type="checkbox"/> State Lands Commission | <input type="checkbox"/> TRPA |
| <input checked="" type="checkbox"/> Air Resources Board | <input type="checkbox"/> OPR - OLGA |
| <input type="checkbox"/> Solid Waste Management Board | <input type="checkbox"/> OPR - Coastal |
| <input type="checkbox"/> SWRCB: Sacramento | <input type="checkbox"/> Bureau of Land Management |
| <input checked="" type="checkbox"/> RWQCB: Region #9 | <input type="checkbox"/> Forest Service |
| <input checked="" type="checkbox"/> Water Rights | <input checked="" type="checkbox"/> Other: Conservation - Division of Mines and Geology |
| <input checked="" type="checkbox"/> Water Quality | <input type="checkbox"/> Other _____ |

For SCH Use Only:

Date Received at SCH _____	Catalog Number _____
Date Review Starts _____	Applicant _____
Date to Agencies _____	Consultant _____
Date to SCH _____	Contact _____ Phone _____
Clearance Date _____	Address _____

Notes: _____

GARY L. PRYOR
DIRECTOR



County of San Diego

DEPARTMENT OF PLANNING AND LAND USE

5201 RUFFIN ROAD, SUITE B, SAN DIEGO, CALIFORNIA 92123-1666
INFORMATION (858) 694-2960
TOLL FREE (800) 411-0017

SAN MARCOS OFFICE
338 VIA VERA CRUZ - SUITE 201
SAN MARCOS, CA 92069-2620
(760) 471-0730

EL CAJON OFFICE
200 EAST MAIN ST. - SIXTH FLOOR
EL CAJON, CA 92020-3912
(619) 441-4030

NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT

July 1, 2004

NOTICE IS HEREBY GIVEN that the County of San Diego, Department of Planning and Land Use will be the Lead Agency and will prepare an Environmental Impact Report in accordance with the California Environmental Quality Act for the following projects. The Department is seeking public and agency input on the scope and content of the environmental information to be contained in the Environmental Impact Report. A Notice of Preparation document, which contains a description of the probable environmental effects of the project, can be reviewed at the Department of Planning and Land Use (DPLU), Project Processing Counter, 5201 Ruffin Road, Suite B, San Diego, California 92123 and at the public libraries listed below. Comments on the Notice of Preparation document must be sent to the DPLU address listed above and should reference the project number and name.

SP 04-03, GPA 04-04, R04-010, TM 5365, P04-012, P04-013, P04-014, LOG NO. 04-08-011; HARMONY GROVE VILLAGE. The proposed Harmony Grove project is a mixed-use, rural residential village consisting of residential uses, commercial uses, open space and park and recreational uses, a sewer package treatment plant and various equestrian facilities including an equestrian ranch for horse boarding and lessons. The project application includes a Specific Plan, a Vesting Tentative Map and three Major Use Permits. One Major Use Permit is being proposed for the Private Equestrian Ranch, one Major Use Permit is proposed for the Wastewater Treatment Facility, and the third Major Use Permit is proposed for the remainder of the project site (e.g., residential, commercial, recreation). The 468-acre project site is located approximately three miles west of Interstate 15, approximately two miles south of SR-78 and bound by the City of Escondido to the east and City of San Marcos to the north-northwest within the North County Metro Community Planning Area within the unincorporated area of San Diego County. Locally, the project site is located north and south of Harmony Grove Road and east and west of Country Club Drive. Other roads crossing or abutting the project study area include Wilgen Road, Bresa de Loma Drive, Mount Whitney Road and Hillside Drive. Comments on this Notice of Preparation document must be received no later than **August 2, 2004** at 4:00 p.m. (a 30 day public review period). This Notice of Preparation can also be reviewed at the San Marcos Branch Library located at #2 Civic Center Drive, San Marcos, CA 92069 and the Escondido Branch Library located at 239 South Kalmia Street, Escondido, CA 92025. A Public Scoping Meeting will be held to solicit comments on the EIR. This meeting will be held on July 19, 2004 at the Elfin Forest/Harmony Grove Fire Station, 20223 Elfin Forest Road, Escondido, CA 92029 beginning at 6:00 p.m. For additional information, please contact Kristin Blackson at (858) 694-3012 or by e-mail at kristin.blackson@sdcounty.ca.gov.

GARY L. PRYOR
DIRECTOR



County of San Diego

DEPARTMENT OF PLANNING AND LAND USE

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NOTICE OF PREPARATION DOCUMENTATION

DATE: July 1, 2004

PROJECT NAME: Harmony Grove Village

PROJECT NUMBER(S): SP 04-03; GPA 04-04; R04-010; TM 5365; P04-012; P04-013; P04-014,

PROJECT APPLICANT: New Urban West (NUW) Management, LLC
520 Broadway, Suite 100
Santa Monica, CA 90401

ENV. REVIEW NUMBER: 04-08-011

PROJECT DESCRIPTION:

The proposed Harmony Grove project is a mixed-use, rural residential village consisting of residential uses, commercial uses, open space and park and recreational uses, a sewer package treatment plant and various equestrian facilities including an equestrian ranch for horse boarding and lessons. The project application includes a Specific Plan, a Vesting Tentative Map and three Major Use Permits (MUP). One MUP is being proposed for the Private Equestrian Ranch (PER), one MUP is proposed for the Wastewater Treatment Facility, and the third MUP is proposed for the remainder of the project site (e.g., residential, commercial, recreation). The proposed project is organized into seven planning areas based upon the types of land uses proposed. These planning areas are described in more detail in the Harmony Grove Village Specific Plan and summarized below in Table 1.

Table 1: Harmony Grove Village Planning Areas

Planning Area	Acres	% of Total Acreage	Housing Units	Comm./Retail s.f.
1. Harmony Village	81	17	365 du	
2. Village Center	12	3	28 du	40,000 s.f.*
3. South Creek	30	6	14 du	
4. The Hillside	140	30	124 du	
5. The Groves	84	18	112 du	
6. East Village	84	18	79 du	
7. Equestrian Ranch	37	8	3	
Total	468 ac.	100%	742 dwelling units	40,000 s.f.

- Includes 25,000 s.f. of general commercial (retail/office) and another 15,000 s.f. of live/work space.

Residential Uses: A variety of single-family residential unit types are proposed ranging from low density, large-lots in the Groves planning area to live/work dwellings in the Village Center. Lot sizes vary between 2,200 s.f. and over two acres and homes vary between approximately 1,500 s.f. and 5,000 s.f. A total of 32 dwelling units are proposed within the Village Center as part of the live/work mixed use area. The number of units per acre varies throughout the project site, with the overall gross density within the project not exceeding 1.6 dwelling units per acre. Proposed residential units will vary in architecture, as described in detail in the Specific Plan, with maximum building heights at 30 feet and three-stories.

Commercial/Retail: Some supporting commercial and retail uses are located within the Village Center (Planning Area 2) and are proposed to consist of establishments that would support primarily the Harmony Grove Village residents such as a coffee shop, delicatessen, business offices, post office, etc. The total gross acreage for office/retail use is two acres, not including the land proposed for the live/work buildings noted above. Approximately 25,000 s.f. is proposed for the commercial/retail uses, with another 15,000 s.f. anticipated within the live/work units. The on-site commercial and retail land uses are not solely for use by the Harmony Grove Village but are expected to attract a minimum number of residents from outside the Village.

Some retail sales are anticipated to be related to the proposed equestrian facilities within the Village, including sales associated with horse boarding, training and showing. Refer to Equestrian Facilities for further description of these proposed uses.

Institutional: A few pads are proposed to be reserved for institutional land uses, such as a fire station and a proposed sewer package treatment plant. The institutional land uses are located in Planning Area 6, the East Village. The proposed sewer package treatment plant is located east of Country Club Drive and would consist of the following elements: a 17,000 s.f. area with a 20' x 50' building which would house the control room, electrical equipment, air blowers and a small lab; an effluent storage area of approximately 40' x 50'; two adjacent equipment lots (15' x 50' and 20' x 50'); and a

sludge bed covering an area of approximately 50' x 100'. The plant would treat effluent from all of the Harmony Grove Village development, with the exception of the Private Equestrian Ranch (Planning Area 7) which would utilize a septic system for effluent treatment/disposal. The plant is anticipated to be owned and operated either by a County Sanitation District or a California Water District which would have to be formed to own and operate the facility. The sewer treatment plant is proposed to employ the Zenon Process of treatment, producing tertiary treated effluent for use as reclaimed water for on-site irrigation. The effluent is proposed to meet the Title 22, Division 4 of the California Administrative Code for unrestricted irrigation reuse of reclaimed water.

Open Space and Recreation: A total of 200 acres of open space and recreational land uses are proposed, covering approximately 42 percent of the project study area. The open space uses include the following: 12 acres of parks (public and private), 8 acres of multi-use trails, 91 acres of naturalized open space and transitional open space area, 46 acres of landscaped open space, and 43 acres of equestrian facilities. The 12 acres of parkland consists of five public parks, including Village Square Park, Village Green Park, two South Creek Parks, and Hillside Park. In addition, a series of small, private recreation areas are planned within Harmony Village (Planning Area 1), including swimming pools, children's play areas and passive recreational areas.

The 43 acres of equestrian facilities are proposed in three locations throughout the Village, the Private Equestrian Ranch (37 acres), a two-acre equestrian facility located in Planning Area 4, and a four-acre facility located in Planning Area 3.

Equestrian Facilities: Three equestrian facilities are proposed within Harmony Grove Village: the 37-acre Private Equestrian Ranch (PER) located in Planning Area 7, south of Harmony Grove Road, a four-acre equestrian facility within Planning Area 3 (South Creek) and a two-acre equestrian facility within Planning Area 4 (The Hillside).

The PER is proposed to accommodate up to 80 horses for boarding and training and will include the following land uses: grass pasture, grass field, schooling ring, hunter ring, dressage arena, mare motel, main barn, dirt paddocks, hot walker and show arena. In addition to the proposed horse facilities, two single-family residences are proposed in addition to the existing home located in this area. Employees anticipated to operate the PER include: two independent contracting trainers (not living on-site), and one resident ranch manager (living on the premises). Hours of operation will be limited to daylight hours.

It is anticipated that approximately six times per year, the PER will host a horse show for up to 120 horses for each show, in addition to the 80 horses boarded on-site. The shows are expected to last approximately three-days over the weekend. Horse shows will require a temporary public address system. Horse boarding during these events is expected to be accommodated by temporary portable stalls set up near the show arenas in the southeast corner of the PER.

Parking and access roads within the eastern portion of the PER are proposed to be surfaced with gravel, small rock or ground asphalt. Parking for lessons and the occasional horse show will be accommodated within Planning Area 7. On-street parking is not proposed.

Some retail sales are anticipated within the PER, providing supplies for horse boarding, training and showing. A maximum of 3,500 s.f. is expected for retail purposes. Temporary commercial stands are also expected to be set up on show days.

A manure disposal plan is proposed to be prepared that includes manure removal twice a week via a commercial dumpster. No hazardous materials are proposed to be stored on-site. A fly/pest control system (automatic) is proposed to be installed in the main barn and outside corral areas. Each arena is proposed to include a watering system to control dust.

The equestrian facilities proposed within Planning Areas 3 and 4 are proposed to consist of small community equestrian boarding and exercise facilities.

Landscaping: A detailed landscape plan has been developed for the proposed project and is described in the Specific Plan in text with supporting graphics. Five major landscape zones are proposed for Harmony Grove Village: 1) Natural/Transitional Landscape Zone; 2) Riparian Landscape Zone; 3) Valley Landscape Zone; 4) Hillside Landscape Zone; and 5) Grove Landscape Zone. Refer to Chapter III.E. of the Specific Plan for the proposed landscape design. This plan also includes details relative to proposed lighting and fencing.

Construction and Grading: Proposed landform modifications include approximately 2,879,800 cubic yards of cut at a maximum cut slope ratio of 1.5:1 and approximately 2,852,500 cubic yards of fill with a maximum fill slope ratio of 2:1. Maximum cut height is expected to be 30 feet and maximum fill slope height is anticipated to be 40 feet. No retaining walls are proposed. Some blasting is anticipated for project grading and is identified on the project grading plan.

Circulation: Four changes are proposed to the existing circulation system in the project study area: 1) A portion of Harmony Grove Road along the project frontage between Wilgen Road and Country Club Drive is proposed to be reclassified from a Collector roadway to a Town Collector roadway; 2) A portion of Country Club Drive along the project frontage between Harmony Grove Road and Kauana Loa Drive is proposed to be reclassified from a Collector roadway to a Modified Rural Light Collector; 3) A new roadway is proposed to connect Country Club Drive to Harmony Grove (proposed as "Village Road") and is proposed to be classified as a Modified Rural Light Collector; and 4) an extension of Avenida del Diablo is proposed to continue the two-lane Rural Light Collector from its current terminus at Citracado Parkway to Country Club Drive. The alternative to the Avenida del Diablo extension is the widening of

Harmony Grove Road north of the proposed intersection of new Village Road and Harmony Grove Road.

Offsite Improvements: As noted above, the proposed project includes the extension of an existing off-site roadway and the construction of a new roadway connecting Harmony Grove Road to Country Club Drive.

PROJECT LOCATION:

The project is located within unincorporated County of San Diego in the North County Metropolitan Subregional planning area. The 468-acre project site is located approximately three miles west of Interstate 15, approximately two miles south of SR-78 and bound by the City of Escondido to the east and City of San Marcos to the north-northwest. Locally, the project site is located north and south of Harmony Grove Road and east and west of Country Club Drive. Other roads crossing or abutting the project study area include Wilgen Road, Bresa de Loma Drive, Mount Whitney Road and Hillside Drive.

PROBABLE ENVIRONMENTAL EFFECTS:

The probable environmental effects associated with the project are detailed in the attached Environmental Initial Study. All questions answered "Potentially Significant Impact" or "Less than Significant with Mitigation Incorporated" will be analyzed further in the Environmental Impact Report. All questions answered "Less than Significant Impact" or "Not Applicable" will not be analyzed further in the Environmental Impact Report.

The following is a summary of the subject areas to be analyzed in the EIR and the particular issues of concern:

Based on an Initial Study prepared by the County of San Diego Department of Planning and Land Use, dated May 28, 2004, it has been determined that the potentially significant environmental effects that may occur as a result of implementation of the project include: aesthetics; agricultural resources; air quality; biological resources; cultural resources; geology and soils; hazards and hazardous materials; hydrology/water quality; land use and planning; mineral resources; noise; population and housing; public services; recreation; transportation/circulation; and utilities and services. These issues, along with an analysis of project alternatives, cumulative impacts, and potential for growth inducement, will be discussed in the EIR for the Harmony Grove Village project (ER-04-08-011).

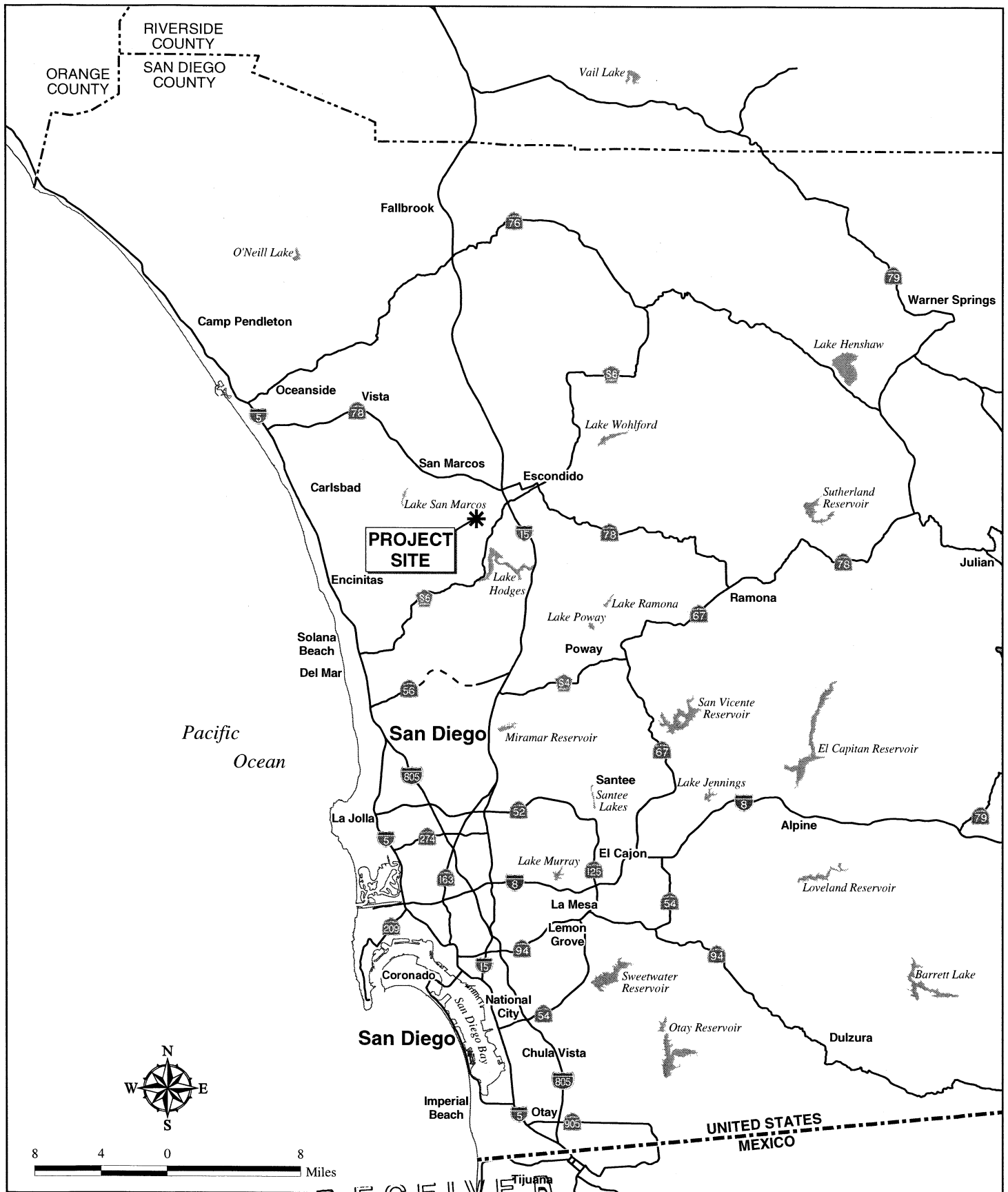
PUBLIC SCOPING MEETING:

Consistent with Section 21083.9 of the CEQA Statutes, a public scoping meeting will be held to solicit comments on the EIR. This meeting will be held on July 19, 2004 at the Elfin Forest/Harmony Grove Fire Station, 20223 Elfin Forest Rd., Escondido, CA 92029 beginning at 6:00pm.

Attachments:

- Project Regional Location Map
- Project Detailed Location Map
- Plot Plan Exhibit
- Environmental Initial Study

ND0704\0408011-NOP;tf



ER 04-08-011

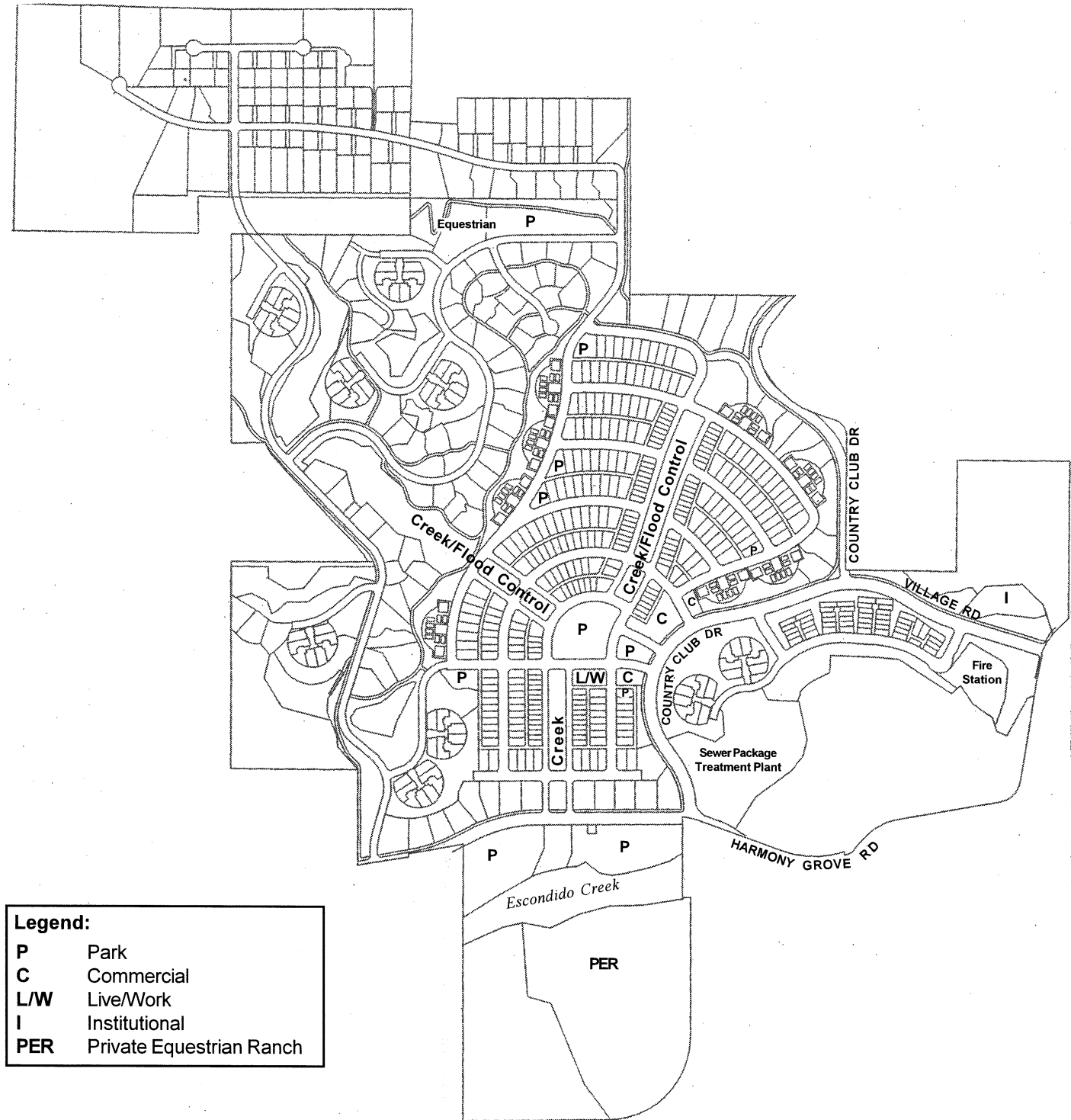
HELIX

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JUN 22 2004
DEPARTMENT OF PLANNING
AND LAND USE

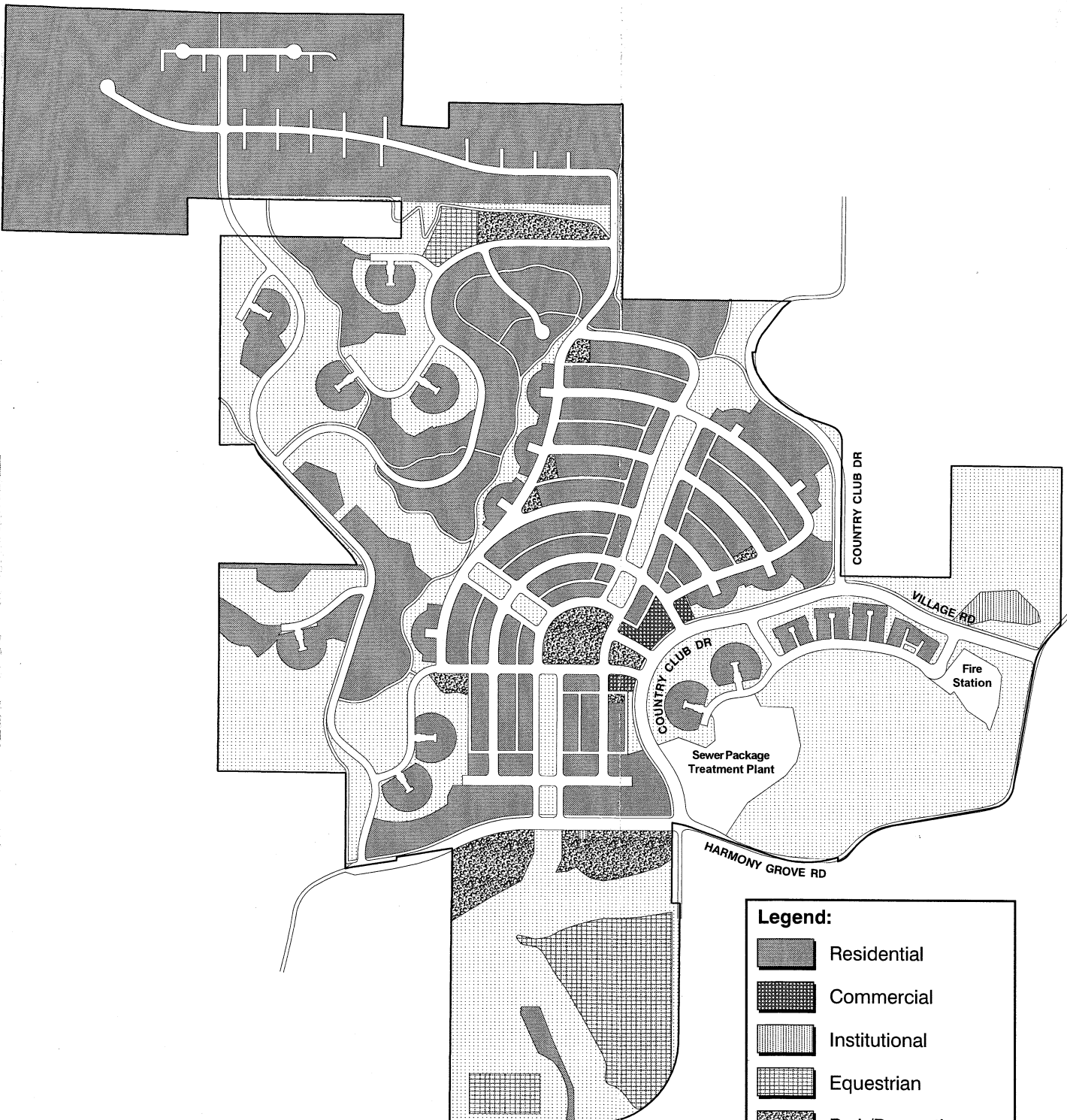
Regional Location Map

HARMONY GROVE VILLAGE

Figure 1



- Legend:**
- P Park
 - C Commercial
 - L/W Live/Work
 - I Institutional
 - PER Private Equestrian Ranch



- Legend:**
- Residential
 - Commercial
 - Institutional
 - Equestrian
 - Park/Recreation
 - Open Areas

Source: Rick Engineering, June 2004
 I:\ArcGIS\N\UW-05_Harmony\OtherGraphics\ProjectPlot.pmd

ER 04-08-011

HELIX

Project Plot Plan
 HARMONY GROVE VILLAGE

JUN 22 2004

DEPARTMENT OF PLANNING
AND LAND USE

Figure 3

GARY L. PRYOR
DIRECTOR



County of San Diego

DEPARTMENT OF PLANNING AND LAND USE

5201 RUFFIN ROAD, SUITE B, SAN DIEGO, CALIFORNIA 92123-1666
INFORMATION (858) 694-2960
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July 1, 2004

CEQA Initial Study - Environmental Checklist Form **(Based on the State CEQA Guidelines, Appendix G Rev. 10/98)**

1. Project Number(s)/Environmental Log Number/Title:

HARMONY GROVE VILLAGE; GPA 04-04, R04-010, P04-012, P04-013,
P04-014, SP 04-03, TM 5365; LOG NO. 04-08-011

2. Lead agency name and address:

County of San Diego, Department of Planning and Land Use
5201 Ruffin Road, Suite B,
San Diego, CA 92123-1666

3. a. Contact: Kristin Blackson, Planner II
b. Phone number: (858) 694-3012
c. E-mail: kristin.blackson@sdcounty.ca.gov.

4. Project location:

The project is located within unincorporated County of San Diego in the North County Metropolitan Subregional planning area. The 468-acre project site is located approximately three miles west of Interstate 15, approximately two miles south of SR-78 and bound by the City of Escondido to the east and City of San Marcos to the north-northwest. Locally, the project site is located north and south of Harmony Grove Road and east and west of Country Club Drive. Other roads crossing or abutting the project study area include Wilgen Road, Bresa de Loma Drive, Mount Whitney Road and Hillside Drive.

Thomas Brothers Coordinates: Page 1129, Grid B,C,D/4,5,6

5. Project sponsor's name and address:

New Urban West (NUW) Management, LLC
520 Broadway, Suite 100
Santa Monica, CA 90401

6. General Plan Designation

Community Plan: North County Metropolitan
 Existing Land Use
 Designation & Density: (17) Estate Residential - 1 du/2 & 4 acres
 (18) Multiple Rural Use - 1 du/4, 8, & 20 acres
 (19) Intensive Agriculture – 1 du/2, 8, & 20 acres
 (24) Impact Sensitive Area – 1 du/4, 8, 20 acres
 (24) Impact Sensitive/Extractive – 1-du/20 acres

7. Zoning

Existing Use Regulation
 & Density: (A-70) Limited Agriculture - .5 du/2 acres
 (A-72) General Agriculture – 1.25 du/8 acres
 (S-82) Extractive Use – no density allowed
 Special Area Regulation: A (A72 zone)

8. Description of project (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation):

The proposed Harmony Grove project is a mixed-use, rural residential village consisting of residential uses, commercial uses, open space and park and recreational uses, a sewer package treatment plant and various equestrian facilities including an equestrian ranch for horse boarding and lessons. The project application includes a Specific Plan, a Vesting Tentative Map and three Major Use Permits (MUPs). One MUP is being proposed for the Private Equestrian Ranch (PER), one MUP is proposed for the Wastewater Treatment Facility, and the third MUP is proposed for the remainder of the project site (e.g., residential, commercial, recreation). The proposed project is organized into seven planning areas based upon the types of land uses proposed. These planning areas are described in more detail in the Harmony Grove Village Specific Plan and summarized below in Table 1.

Table 1: Harmony Grove Village Planning Areas

Planning Area	Acres	% of Total Acreage	Housing Units	Comm./Retail s.f.
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Total	468 ac.	100%	742 dwelling units	40,000 s.f.

- Includes 25,000 s.f. of general commercial (retail/office) and another 15,000 s.f. of live/work space.

Residential Uses: A variety of single-family residential unit types are proposed ranging from low density, large-lots in the Groves planning area to live/work dwellings in the Village Center. Lot sizes vary between 2,200 s.f. and over two acres and homes vary between approximately 1,500 s.f. and 5,000 s.f. A total of 32 dwelling units are proposed within the Village Center as part of the live/work mixed use area. The number of units per acre varies throughout the project site, with the overall gross density within the project not exceeding 1.6 dwelling units per acre. Proposed residential units will vary in architecture, as described in detail in the Specific Plan, with maximum building heights at 30 feet and three-stories.

Commercial/Retail: Some supporting commercial and retail uses are located within the Village Center (Planning Area 2) and are proposed to consist of establishments that would support primarily the Harmony Grove Village residents such as a coffee shop, delicatessen, business offices, post office, etc. The total gross acreage for office/retail use is two acres, not including the land proposed for the live/work buildings noted above. Approximately 25,000 s.f. is proposed for the commercial/retail uses, with another 15,000 s.f. anticipated within the live/work units. The on-site commercial and retail land uses are not solely for use by the Harmony Grove Village but are expected to attract a minimum number of residents from outside the Village.

Some retail sales are anticipated to be related to the proposed equestrian facilities within the Village, including sales associated with horse boarding, training and showing. Refer to Equestrian Facilities for further description of these proposed uses.

Institutional: A few pads are proposed to be reserved for institutional land uses, such as a fire station and a proposed sewer package treatment plant. The institutional land uses are located in Planning Area 6, the East Village. The proposed sewer package treatment plant is located east of Country Club Drive and would consist of the following elements: a 17,000 s.f. area with a 20' x 50' building which would house the control room, electrical equipment, air blowers and a small lab; an effluent storage area of approximately 40' x 50'; two adjacent equipment lots (15' x 50' and 20' x 50'); and a sludge bed covering an area of approximately 50' x 100'. The plant would treat effluent from all of the Harmony Grove Village development, with the exception of the Private Equestrian Ranch (Planning Area 7) which would utilize a septic system for effluent treatment/disposal. The plant is anticipated to be owned and operated either by a County Sanitation District or a California Water District which would have to be formed to own and operate the facility. The sewer treatment plant is proposed to employ the Zenon Process of treatment, producing tertiary treated effluent for use as reclaimed water for on-site irrigation. The effluent is proposed to meet the Title 22, Division 4 of the California Administrative Code for unrestricted irrigation reuse of reclaimed water.

Open Space and Recreation: A total of 200 acres of open space and recreational land uses are proposed, covering approximately 42 percent of the project study area. The open space uses include the following: 12 acres of parks (public and private), 8 acres of multi-use trails, 91 acres of naturalized open space and transitional open space area, 46 acres of landscaped open space, and 43 acres of equestrian facilities. The 12 acres of parkland consists of five public parks, including Village Square Park, Village Green Park, two South Creek Parks, and Hillside Park. In addition, a series of small, private recreation areas are planned within Harmony Village (Planning Area 1), including swimming pools, children's play areas and passive recreational areas.

The 43 acres of equestrian facilities are proposed in three locations throughout the Village, the Private Equestrian Ranch (37 acres), a two-acre equestrian facility located in Planning Area 4, and a four-acre facility located in Planning Area 3.

Equestrian Facilities: Three equestrian facilities are proposed within Harmony Grove Village: the 37-acre Private Equestrian Ranch (PER) located in Planning Area 7, south of Harmony Grove Road, a four-acre equestrian facility within Planning Area 3 (South Creek) and a two-acre equestrian facility within Planning Area 4 (The Hillside).

The PER is proposed to accommodate up to 80 horses for boarding and training and will include the following land uses: grass pasture, grass field, schooling ring, hunter ring, dressage arena, mare motel, main barn, dirt paddocks, hot walker and show arena. In addition to the proposed horse facilities, two single-family residences are proposed in addition to the existing home located in this area. Employees anticipated to operate the PER include: two independent contracting trainers (not living on-site), and one resident ranch manager (living on the premises). Hours of operation will be limited to daylight hours.

It is anticipated that approximately six times per year, the PER will host a horse show for up to 120 horses for each show, in addition to the 80 horses boarded on-site. The shows are expected to last approximately three-days over the weekend. Horse shows will require a temporary public address system. Horse boarding during these events is expected to be accommodated by temporary portable stalls set up near the show arenas in the southeast corner of the PER.

Parking and access roads within the eastern portion of the PER are proposed to be surfaced with gravel, small rock or ground asphalt. Parking for lessons and the occasional horse show will be accommodated within Planning Area 7. On-street parking is not proposed.

Some retail sales are anticipated within the PER, providing supplies for horse boarding, training and showing. A maximum of 3,500 s.f. is expected for retail

purposes. Temporary commercial stands are also expected to be set up on show days.

A manure disposal plan is proposed to be prepared that includes manure removal twice a week via a commercial dumpster. No hazardous materials are proposed to be stored on-site. A fly/pest control system (automatic) is proposed to be installed in the main barn and outside corral areas. Each arena is proposed to include a watering system to control dust.

The equestrian facilities proposed within Planning Areas 3 and 4 are proposed to consist of small community equestrian boarding and exercise facilities.

Landscaping: A detailed landscape plan has been developed for the proposed project and is described in the Specific Plan in text with supporting graphics. Five major landscape zones are proposed for Harmony Grove Village: 1) Natural/Transitional Landscape Zone; 2) Riparian Landscape Zone; 3) Valley Landscape Zone; 4) Hillside Landscape Zone; and 5) Grove Landscape Zone. Refer to Chapter III.E. of the Specific Plan for the proposed landscape design. This plan also includes details relative to proposed lighting and fencing.

Construction and Grading: Proposed landform modifications include approximately 2,879,800 cubic yards of cut at a maximum cut slope ratio of 1.5:1 and approximately 2,852,500 cubic yards of fill with a maximum fill slope ratio of 2:1. Maximum cut height is expected to be 30 feet and maximum fill slope height is anticipated to be 40 feet. No retaining walls are proposed. Some blasting is anticipated for project grading and is identified on the project grading plan.

Circulation: Four changes are proposed to the existing circulation system in the project study area: 1) A portion of Harmony Grove Road along the project frontage between Wilgen Road and Country Club Drive is proposed to be reclassified from a Collector roadway to a Town Collector roadway; 2) A portion of Country Club Drive along the project frontage between Harmony Grove Road and Kauana Loa Drive is proposed to be reclassified from a Collector roadway to a Modified Rural Light Collector; 3) A new roadway is proposed to connect Country Club Drive to Harmony Grove (proposed as "Village Road") and is proposed to be classified as a Modified Rural Light Collector; and 4) an extension of Avenida del Diablo is proposed to continue the two-lane Rural Light Collector from its current terminus at Citracado Parkway to Country Club Drive. The alternative to the Avenida del Diablo extension is the widening of Harmony Grove Road north of the proposed intersection of new Village Road and Harmony Grove Road.

Offsite Improvements: As noted above, the proposed project includes the extension of an existing off-site roadway and the construction of a new roadway connecting Harmony Grove Road to Country Club Drive.

9. Surrounding land uses and setting (Briefly describe the project's surroundings):

The project study area consists of rural residential, equestrian/ranch uses, along with two egg ranches, a dairy ranch, avocado groves, citrus groves, and an abandoned rock quarry. The egg and dairy ranches include egg packing facilities, chicken houses, milk barns and out-structures and sheds to support the agricultural land uses. A fertilizer processing operation, and ponds to collect dairy and egg ranch runoff are also located near these facilities.

The topography within the study area undulates with the central portion of the study area consisting of more flat, valley-like topography (approximately 560 feet above mean sea level (amsl)) and the surrounding areas rising to a high of approximately 940 feet amsl in the southeast corner of the site where the abandoned rock quarry is located. Elevations along the western and northwestern boundaries rise to approximately 700-800 feet amsl. A slope analysis prepared for the project site shows that more than half the site is at less than 15% slope and approximately one-quarter of the site has slopes exceeding 25%. Escondido Creek crosses the project study in an east-west direction, south of Harmony Grove Road. A tributary to Escondido Creek cuts through the middle of the site, in a north-south direction.

Vegetation communities in the study area consists primarily of freshwater marsh, riparian woodland, southern willow scrub, mulefat scrub, disturbed wetland, Diegan coastal sage scrub, coast live oak woodland, southern mixed chaparral, and non-native grasslands. Escondido Creek is considered a regionally significant resource and is in fairly good condition. The north-south, unnamed tributary is heavily disturbed and is proposed to be rehabilitated as part of the proposed project.

10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

<u>Permit Type/Action</u>	<u>Agency</u>
General Plan Amendment	County of San Diego
Habitat Loss Permit	County of San Diego
Major Use Permit	County of San Diego
Landscape Plans	County of San Diego
Rezone	County of San Diego
Road Opening	County of San Diego
Specific Plan	County of San Diego
Tentative Map	County of San Diego
County Right-of-Way Permits	County of San Diego
Construction Permit	
Excavation Permit	
Encroachment Permit	

<u>Permit Type/Action</u>	<u>Agency</u>
Grading Permit	County of San Diego
401 Permit - Water Quality Certification	Regional Water Quality Control Board (RWQCB)
404 Permit – Dredge and Fill	US Army Corps of Engineers (ACOE)
1603 – Streambed Alteration Agreement	CA Department of Fish and Game (CDFG)
Section 7 - Consultation or Section 10a Permit – Incidental Take	US Fish and Wildlife Services (USFWS)
Air Quality Permit to Construct	Air Pollution Control District (APCD)
Air Quality Permit to Operate – Title V Permit	APCD
National Pollutant Discharge Elimination System (NPDES) Permit	RWQCB
General Industrial Storm water Permit	RWQCB
General Construction Storm water Permit	RWQCB
Water District Approval	Rincon Del Diablo Municipal Water District
School District Approval	Escondido Union School District Escondido Union High School District
Deannexation and Formation Approval	LAFCO

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED: The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

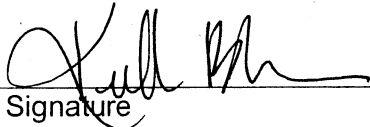
- | | | |
|--|---|---|
| <input checked="" type="checkbox"/> <u>Aesthetics</u> | <input checked="" type="checkbox"/> <u>Agriculture Resources</u> | <input checked="" type="checkbox"/> <u>Air Quality</u> |
| <input checked="" type="checkbox"/> <u>Biological Resources</u> | <input checked="" type="checkbox"/> <u>Cultural Resources</u> | <input checked="" type="checkbox"/> <u>Geology & Soils</u> |
| <input checked="" type="checkbox"/> <u>Hazards & Haz. Materials</u> | <input checked="" type="checkbox"/> <u>Hydrology & Water Quality</u> | <input checked="" type="checkbox"/> <u>Land Use & Planning</u> |
| <input checked="" type="checkbox"/> <u>Mineral Resources</u> | <input checked="" type="checkbox"/> <u>Noise</u> | <input checked="" type="checkbox"/> <u>Population & Housing</u> |
| <input checked="" type="checkbox"/> <u>Public Services</u> | <input checked="" type="checkbox"/> <u>Recreation</u> | <input checked="" type="checkbox"/> <u>Transportation/Traffic</u> |
| <input checked="" type="checkbox"/> <u>Utilities & Service Systems</u> | <input checked="" type="checkbox"/> <u>Mandatory Findings of Significance</u> | |

DETERMINATION: (To be completed by the Lead Agency)
 On the basis of this initial evaluation:

- ☐ On the basis of this Initial Study, the Department of Planning and Land Use finds that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

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- ☐ On the basis of this Initial Study, the Department of Planning and Land Use finds that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☒ On the basis of this Initial Study, the Department of Planning and Land Use finds that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.



Signature

7/1/04

Date

Kristin Blackson
Printed Name

PLANNER II
Title

Harmony Grove Village; ER 04-08-011 - 9 -
SP 04-03, GPA 04-04, R04-010,
TM 5365, P04-012, P04-013, P04-014

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INSTRUCTIONS ON EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
4. "Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Incorporated," describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. The explanation of each issue should identify:
 - a) The significance criteria or threshold, if any, used to evaluate each question; and

- b) The mitigation measure identified, if any, to reduce the impact to less than significance

I. AESTHETICS -- Would the project:

a) Have a substantial adverse effect on a scenic vista?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Scenic vistas are singular vantage points that offer unobstructed views of valued viewsheds, including areas designated as official scenic vistas along major highways or County designated visual resources. Based on a site visit completed by Bill Stocks in July 2003 and review of planning documents that include the Scenic Highways Element and the North Metropolitan Subregional Plan, the proposed project is not located near or visible from a scenic vista and will not change the composition of an existing scenic vista. Therefore, the proposed project will not have any substantial adverse effect on a scenic vista. The project site is located both north and south of Harmony Grove Road in the vicinity of the intersection with Country Club Drive.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: State scenic highways refer to those highways that are officially designated. A scenic highway is officially designated as a State scenic highway when the local jurisdiction adopts a scenic corridor protection program, applies to the California Department of Transportation for scenic highway approval, and receives notification from Caltrans that the highway has been designated as an official Scenic Highway. Based on a site visit completed by Bill Stocks in July 2003 and review of planning documents that include the Scenic Highways Element and the North Metropolitan Subregional Plan, the proposed project is not located near or visible from a scenic highway and will not change the composition of an existing scenic vista. Therefore, the proposed project will not have any substantial adverse effect on scenic resources within a designated scenic vista.

c) Substantially degrade the existing visual character or quality of the site and its surroundings?

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- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The proposed landform modifications include approximately 2,879,800 cubic yards of cut at a maximum cut slope ratio of 1.5:1 and approximately 2,852,500 cubic yards of fill with a maximum fill slope ratio of 2:1. This is about 6,153 cubic yards per acre. This may be acceptable depending on the amount of landform alteration involved, the height of the manufactured slopes and the mitigation measures proposed. Maximum cut height is expected to be 30 feet and maximum fill slope height is anticipated to be 40 feet. No retaining walls are proposed. Some blasting is anticipated for project grading and is identified on the project grading plan.

An extensive landscape plan is proposed as part of the Specific Plan that includes ornamental landscaping, retention of native vegetation and restoration of existing habitats. A detailed visual analysis must be included in the EIR to address the potential aesthetic and landform modification impacts for both on-site and off-site improvements.

- d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The proposed project will use outdoor lighting and is located within Zone B as identified by the San Diego County Light Pollution Code, approximately 40 miles from the Mount Palomar Observatory. However, it will not adversely affect nighttime views or astronomical observations, because the project will conform to the Light Pollution Code (Section 59.101-59.115), including the lamp type and shielding requirements per fixture and hours of operation limitations for outdoor lighting.

In addition, the proposed project will control outdoor lighting and sources of glare in the following ways:

1. The project will not install outdoor lighting that directly illuminates neighboring properties.

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2. The project will not install outdoor lighting that would cast a direct beam angle towards a potential observer, such as a motorists, cyclist or pedestrian.
3. The project will not install outdoor lighting for vertical surfaces such as buildings, landscaping, or signs in a manner that would result in useful light or spill light being cast beyond the boundaries of intended area to be lit.
4. The project will not install any highly reflective surfaces such as glare-producing glass or high-gloss surface color that will be visible along roadways, pedestrian walkways, or in the line of sight of adjacent properties.

The project will not contribute to significant cumulative impacts on day or nighttime views because the project conforms to the Light Pollution Code. The Code was developed by the San Diego County Department of Planning and Land Use and Department of Public Works in cooperation with lighting engineers, astronomers, land use planners from San Diego Gas and Electric, Palomar and Mount Laguna observatories, and local community planning and sponsor groups to effectively address and minimize the impact of new sources light pollution on nighttime views. The standards in the Code are the result of this collaborative effort and establish an acceptable level for new lighting. Compliance with the Code is required prior to issuance of any building permit for any project. Mandatory compliance for all new building permits ensures that this project in combination with all past, present and future projects will not contribute to a cumulatively considerable impact. Moreover, the project's additional outdoor lighting and glare is controlled and limits light pollution to the project site or directly around the light source and will not contribute to a cumulative impact. Therefore, compliance with the Code, in combination with the outdoor lighting and glare controls listed above ensure that the project will not create a significant new source of substantial light or glare, which would adversely affect daytime or nighttime views in the area, on a project or cumulative level.

II. AGRICULTURE RESOURCES -- In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:

- a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

☒ Potentially Significant Impact

☐ Less than Significant Impact

☐ Potentially Significant Unless Mitigation Incorporated

☐ No Impact

Discussion/Explanation:

Potentially Significant Impact: Portions of the project site and surrounding area contain lands designated as Unique Farmland and/or Farmland of Local Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. As such, potentially significant project or cumulative level conversion of Unique Farmland and/or Farmland of Local Importance to a non-agricultural will occur as a result of this project. Therefore, any potential agricultural impacts from the project must be analyzed in an Agricultural Analysis and discussed in the context of the EIR.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: Portions of the project site are zoned (A-70) Limited Agriculture and (A-72) General Agriculture, which are considered to be an agricultural zone. Additionally, the project site supports lands that are included as a part of a Williamson Act Agricultural Preserve (Williamson Act Lands). The proposed project may create a conflict with existing zoning and the Williamson Act contract. Therefore, any potential agricultural impacts from the project must be analyzed in an Agricultural Analysis and discussed in the context of the EIR.

c) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The project site and surrounding area have land designated as Unique Farmland, Farmland of Local Importance, support active agriculture and contain prime agricultural soils. As such, potentially significant project or cumulative level conversion of agricultural land to a non-agricultural may occur as a result of this project. Therefore, any potential agricultural impacts from the project must be analyzed in an Agricultural Analysis and discussed in the context of the EIR.

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III. AIR QUALITY -- Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

- a) Conflict with or obstruct implementation of the San Diego Regional Air Quality Strategy (RAQS) or applicable portions of the State Implementation Plan (SIP)?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The project has the potential to result in emissions of significant quantities of criteria pollutants listed in the California Ambient Air Quality Standards or toxic air contaminants as identified by the California Air Resources Board, primarily related to construction operations, diesel toxins, hot spots, and vehicle trips. Therefore, any potential air quality impacts from the project must be analyzed in an Air Quality Analysis and discussed in the context of the EIR.

- b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

In general, air quality impacts from land use projects are the result of emissions from motor vehicles, and from short-term construction activities associated with such projects. The San Diego County Air Pollution Control District (SDAPCD) has established screening-level criteria for all new source review (NSR) in APCD Rule 20.2. For CEQA purposes, these screening-level criteria can be used as numeric methods to demonstrate that a project's total emissions (e.g. stationary and fugitive emissions, as well as emissions from mobile sources) would not result in a significant impact to air quality. Since APCD does not have screening-level criteria for emissions of volatile organic compounds (VOCs), the use of the screening level for reactive organic compounds (ROC) from the CEQA Air Quality Handbook for the South Coast Air Basin (SCAB), which has stricter standards for emissions of ROCs/VOCs than San Diego's, is appropriate. However, the eastern portions of the county have atmospheric conditions that are characteristic of the Southeast Desert Air Basin (SEDAB). SEDAB is not classified as an extreme non-attainment area for ozone and therefore has a less restrictive screening-level. Projects located in the

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eastern portions of the County can use the SEDAB screening-level threshold for VOCs.

Potentially Significant Impact: The primary sources of air pollutants would be from grading and construction activities (short-term) and from vehicle trips associated with the proposed project.

A substantial amount of earthwork is anticipated for site preparation and construction of infrastructure and utilities servicing the Harmony Grove Village and is expected to also require a substantial amount of construction traffic and associated emissions. Potential short-term construction-related air quality impacts should be evaluated in the EIR. In addition, particulate emissions from diesel-fired construction equipment have been added to the list of known carcinogens by the State of California. As such, health impacts from the diesel exhaust associated with the construction activities will be evaluated in the EIR.

The proposed project would result in approximately 9,132 Average Daily Trips (ADT). Emissions associated with project traffic should be evaluated in an Air Quality Technical Report.

In addition to short-term construction and long-term traffic emissions, the proposed project's equestrian facilities may generate fugitive dust and the proposed sewer package treatment plant may generate stationary emissions. Therefore, any potential air quality impacts from the project must be analyzed in an Air Quality Analysis and discussed in the context of the EIR.

- c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

San Diego County is presently in non-attainment for the 1-hour concentrations under the California Ambient Air Quality Standard (CAAQS) for Ozone (O₃). San Diego County is also presently in non-attainment for the annual geometric mean and for the 24-hour concentrations of Particulate Matter less than or equal to 10 microns (PM₁₀) under the CAAQS. O₃ is formed when volatile organic compounds (VOCs) and nitrogen oxides (NO_x) react in the presence of sunlight. VOC sources include any source that burns fuels (e.g., gasoline, natural gas, wood, oil); solvents; petroleum processing and storage; and pesticides. Sources of PM₁₀ in both urban

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and rural areas include: motor vehicles, wood burning stoves and fireplaces, dust from construction, landfills, agriculture, wildfires, brush/waste burning, and industrial sources of windblown dust from open lands.

Potentially Significant Impact: Air quality emissions associated with the project include emissions of PM₁₀, NO_x and VOCs from construction/grading activities, and VOCs as the result of increase of traffic from operations at the facility. Therefore, any potential air quality impacts from the project must be analyzed in an Air Quality Analysis and discussed in the context of the EIR.

d) Expose sensitive receptors to substantial pollutant concentrations?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Air quality regulators typically define sensitive receptors as schools (Preschool-12th Grade), hospitals, resident care facilities, or day-care centers, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality.

Less Than Significant Impact: Based a site visit conducted by Kristin Blackson on April 16, 2004, no sensitive receptors have been identified within a quarter-mile (the radius determined by the SCAQMD in which the dilution of pollutants is typically significant) occur of the proposed project. As such, the project will not expose sensitive populations to excessive levels of air pollutants.

e) Create objectionable odors affecting a substantial number of people?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The project could produce objectionable odors, which would result from the proposed equestrian and the sewer package treatment plant. An odor analysis shall be included in the air quality technical study. Therefore, any potential air quality impacts due to odor from the project must be analyzed in an Air Quality Analysis and discussed in the context of the EIR.

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IV. BIOLOGICAL RESOURCES -- Would the project:

- a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The site is known to support several sensitive habitats, which support and have the potential to support endangered, threatened, or rare plant or animal species. The site supports the following sensitive habitats: freshwater marsh, riparian woodland, southern willow scrub, mulefat scrub, disturbed wetland, Diegan coastal sage scrub, coast live oak woodland, southern mixed chaparral, and non-native grassland. Pursuant to the CEQA and the Resource Protection Ordinance (in addition to state and federal laws), impacts to listed, or otherwise rare species must be minimized and often avoided entirely.

Therefore, based on the fact that the site has the potential to support several endangered, threatened, or rare plant or animal species or their habitats the project may have a potentially significant impact on biological resources. As such any potentially significant adverse effects, including noise from construction or the project, to endangered, threatened, or rare plant or animal species or their habitats must be addressed in the context of the biological technical study and the EIR.

- b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The site supports a number of wetland habitats and wetland buffers that were identified on a site visit conducted by Kristin Blackson on April 16, 2004. These wetlands and wetland buffers may be significantly impacted by the proposed project and as proposed the project may not conform to the wetland and wetland buffer regulations within the Resource Protection Ordinance. Therefore, impacts to wetlands and wetland buffers and conformance

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with the Resource Protection Ordinance must be demonstrated and discussed in the context of a biological technical study and the EIR.

- c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The site contains a number of significant drainages and wetland habitats. Specifically, Escondido Creek and several tributaries bisect the project site, which if impacted may result in significant alterations to known watersheds or wetlands that may be considered California Department of Fish and Game and/or Army Corps of Engineers jurisdictional wetlands or waters, and would potentially require a Section 1603 "Streambed Alteration Agreement" and/or 404 Permit. Therefore, all significant drainages and wetlands must be defined and impacts identified in a biological technical study and in the EIR.

- d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: Potential wildlife corridors exist throughout the project site. Wildlife corridors potentially exist along natural drainages through various sensitive habitat types on-site, including: Diegan coastal sage scrub; riparian areas and wetlands. The current project design may potentially impact these corridors and may create additional indirect impacts through increased noise and activity. Therefore, any potentially significant impacts to wildlife dispersal corridors must be discussed in the biological technical study and the EIR.

- e) Conflict with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, other approved local, regional or state habitat conservation plan or any other local policies or ordinances that protect biological resources?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: Refer to the attached Ordinance Compliance Checklist dated May 28, 2004 for further information on consistency with any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, other approved local, regional or state habitat conservation plan, including, Habitat Management Plans (HMP) Special Area Management Plans (SAMP) or any other local policies or ordinances that protect biological resources including the Multiple Species Conservation Program (MSCP), Biological Mitigation Ordinance, Resource Protection Ordinance (RPO), Habitat Loss Permit (HLP).

V. CULTURAL RESOURCES -- Would the project:

- a) Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: A number of historical resources have been identified within a mile radius of the site. As a result, the project may grade, disturb, or threaten a potentially significant historical artifact, object, structure, or site. Therefore, the potential for impacts to historic structures will be evaluated in the archaeological survey and discuss the survey results in the context of the EIR.

- b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: A number of archaeological resources have been identified within a mile radius of the site. In addition, according to a Cultural Resource Survey, prepared by Brian F. Smith in November 2002, two sites have been identified on site. As a result, the project may grade, disturb, or threaten a potentially significant archaeological or cultural artifact, object, structure, or site. Therefore, the project must complete an archaeological survey and discuss the survey results in the context of the EIR.

- c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: A review of the paleontological maps provided by the San Diego Museum of Natural History, combined with available data on San Diego County's geologic formations indicates that portions of the project-site is located on geological formations that have paleontological resource potential. Portions of the project site contain geologic formations that are composed either of volcanic rocks or high-grade metasedimentary rocks. As a result, the project may directly or indirectly destroy a unique paleontological resource or site. Therefore, the project must discuss potential impacts to paleontological resources in the context of the EIR.

- d) Disturb any human remains, including those interred outside of formal cemeteries?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: A number of archaeological resources have been identified within a mile radius of the site. In addition, according to a Cultural Resource Survey, prepared by Brian F. Smith in November 2002, two sites have been identified on site. As a result, the project may grade, disturb, or threaten a potentially significant archaeological, historical, or cultural artifact, object, structure, or site. Therefore, the project must complete an archaeological survey and discuss the survey results in the context of the EIR.

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VI. GEOLOGY AND SOILS -- Would the project:

- a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
- i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project is not located in a fault rupture hazard zone identified by the Alquist-Priolo Earthquake Fault Zoning Act, Special Publication 42, Revised 1997, Fault-Rupture Hazards Zones in California. Also, staff geologist has reviewed the project and has concluded that no other substantial evidence of recent (Holocene) fault activity is present within the project site. Therefore, there will be no impact from the exposure of people or structures to adverse effects from a known hazard zone as a result of this project.

- ii. Strong seismic ground shaking?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: Although the project site is not located in a hazard zone identified by the Alquist-Priolo Earthquake Fault Zoning Act, the project site is subject to ground shaking from seismic activity. Potential impacts created by the exposure of people to hazards related to seismic ground shaking, rockfall, or landslides must be evaluated in a Geotechnical Report and within the context of the EIR.

- iii. Seismic-related ground failure, including liquefaction?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The geology of the project site is identified as both plutonic and marine/nonmarine sedimentary deposits. This geologic environment is not susceptible to ground failure from seismic activity. In addition, the site is not underlain by poor artificial fill or located within a floodplain. Therefore, there will be no impact from the exposure of people to adverse effects from a known area susceptible to ground failure.

iv. Landslides?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: Portions of the site are located within a landslide susceptibility zone and may result in a significant impact from the exposure of people or structures to adverse effects from an area susceptible to landslides. A Geotechnical Report will be required in order to determine if either pre-existing or potential conditions are present that could become unstable in the event of seismic activity.

b) Result in substantial soil erosion or the loss of topsoil?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: According to the Soil Survey of San Diego County, the soils on-site are identified as follows:

Soil Type		Erosion Index
VaB	Visalia sandy loam, 2 to 5% slopes	Severe 16
VaC	Visalia sandy loam, 5 to 9% slopes	Severe 16
ChB	Chino fine sandy loam, 2 to 5% slopes	Severe 16
CID2	Cienega coarse sandy loam, 5 to 15% slopes	Severe 16
CmE2	Cienega rocky coarse sandy loam, 9 to 30% slopes	Severe 16
EsE2	Escondido very fine sandy loam, 15 to 30% slopes	Severe 16
EsD2	Escondido very fine sandy loam, 9 to 15 percent slopes	Severe 16
FvD	Fallbrook-Vista sandy loams, 9 to 15% slopes	Severe 16

These soils have severe erodibility and as proposed the project may result in unprotected erodible soils; may alter existing drainage patterns; may be located a wetland or significant drainage feature; and may develop steep slopes. Even though, the project is required to comply with the Sections 87.414 (DRAINAGE - EROSION PREVENTION) and 87.417 (PLANTING) of Division 7, EXCAVATION AND GRADING, of the San Diego County Zoning and Land Use Regulations, the project might result in potentially significant erosion. Due to these factors, erosion potential from the project must be discussed in the context of the EIR.

- c) Will the project produce unstable geological conditions that will result in adverse impacts resulting from landslides, lateral spreading, subsidence, liquefaction or collapse?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The project is located on or near geological formations that may be unstable or potentially become unstable as a result of the project. For further information refer to VI Geology and Soils, Question a., i-iv listed above.

- d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: A review of the Soil Survey, San Diego Area CA by the U.S. Department of Agriculture has identified the following on-site soils having a HIGH shrink-swell behavior:

Soil Type		Shrink/Swell Index
LpD2	Las Posas fine sandy loam, 9 to 15% slopes	High
HrC	Huerhuero loam, 2 to 9% slopes	High
HrC2	Huerhuero loam, 5 to 9% slopes	High
LrG	Las Posas stony fine sandy loam, 30 to 65% slopes	High
LrE	Las Posas stony fine sandy loam, 9 to 15% slopes	High

Soil Type		Shrink/Swell Index
LpE2	Las Posas fine sandy loam, 15 to 30% slopes	High
LpD2	Las Posas fine sandy loam, 30 to 65% slopes	High

All other mapped soils on the site have a low to moderate shrink-swell behavior and are identified as stable with no adverse potential for development activity. A Geotechnical Report will be necessary in order to determine whether these conditions can be mitigated through site design and compliance with the Uniform Building Code, Division III – Design Standard for Design of Slab-On-Ground Foundations to Resist the Effects of Expansive Soils and Compressible Soils, which ensure suitable structure safety in areas with expansive soils. Potential impacts from development on soils with high-shrink swell behavior must be discussed in the context of the EIR.

- e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

- ☒ Potentially Significant Impact
 ☐ Less than Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated
 ☐ No Impact

Discussion/Explanation:

Potentially Significant Impact: The Private Equestrian Ranch (Planning Area 7) proposes to utilize a septic system for effluent treatment/disposal. Discharged wastewater must conform to the Regional Water Quality Control Board's (RWQCB) applicable standards, including the Regional Basin Plan and the California Water Code. California Water Code Section 13282 allows RWQCBs to authorize a local public agency to issue permits for OSWS "to ensure that systems are adequately designed, located, sized, spaced, constructed and maintained." The RWQCBs with jurisdiction over San Diego County have authorized the County of San Diego, Department of Environmental Health (DEH) to issue certain OSWS permits throughout the County and within the incorporated cities. DEH will be required to review the OSWS lay-out for the project pursuant to DEH, Land and Water Quality Division's, "On-site Wastewater Systems: Permitting Process and Design Criteria." The EIR must identify if the project has soils capable of adequately supporting the use of septic tanks or alternative wastewater disposal systems as determined by the authorized, local public agency. In addition, the project must comply with the San Diego County Code of Regulatory Ordinances, Title 6, Div. 8, Chap. 3, Septic Tanks and Seepage Pits.

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VII. HAZARDS AND HAZARDOUS MATERIALS -- Would the project:

- a) Create a significant hazard to the public or the environment through the routine transport, storage, use, or disposal of hazardous materials or wastes?

- | | |
|--|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporation | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The project includes a sewer package treatment plant, which would consist of the following elements: a 17,000 s.f. area with a 20' x 50' building which would house the control room, electrical equipment, air blowers and small lab; an effluent storage area of approximately 40' x 50'; two adjacent equipment lots (15' x 50' and 20' x 50'); and a sludge bed covering an area of approximately 50' x 100'. The project is required to disclose and analyze any potential hazardous materials associated with the operating of the plant within the EIR.

- b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The project includes a sewer package treatment plant. The project is required to disclose and analyze any potential hazardous conditions associated with the operating of the plant within the EIR.

- c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

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No Impact: The project is not located within one-quarter mile of and existing or proposed school. Therefore, the project will not have any effect on an existing or proposed school.

- d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project is not located on a site listed in the State of California Hazardous Waste and Substances sites list compiled pursuant to Government Code Section 65962.5.

- e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The proposed project is not located within a Comprehensive Land Use Plan (CLUP) for airports; or within two miles of a public airport. Also, the project does not propose construction of any structure equal to or greater than 150 feet in height, constituting a safety hazard to aircraft and/or operations from an airport or heliport. Therefore, the project will not constitute a safety hazard for people residing or working in the project area.

- f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The proposed project is not within one mile of a private airstrip. As a result, the project will not constitute a safety hazard for people residing or working in the project area.

- g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

The following sections summarize the project's consistency with applicable emergency response plans or emergency evacuation plans.

i. OPERATIONAL AREA EMERGENCY PLAN:

Less Than Significant Impact: The Operational Area Emergency Plan is a framework document that provides direction to local jurisdictions to develop specific operational area of San Diego County. It provides guidance for emergency planning and requires subsequent plans to be established by each jurisdiction that has responsibilities in a disaster situation. The project will not interfere with this plan because it will not prohibit subsequent plans from being established.

ii. SAN DIEGO COUNTY NUCLEAR POWER STATION EMERGENCY RESPONSE PLAN

No Impact: The San Diego County Nuclear Power Station Emergency Response Plan will not be interfered with by the project due to the location of the project, plant and the specific requirements of the plan. The emergency plan for the San Onofre Nuclear Generating Station includes an emergency planning zone within a 10-mile radius. All land area within 10 miles of the plant is not within the jurisdiction of the unincorporated County and as such a project in the unincorporated area is not expected to interfere with any response or evacuation.

iii. OIL SPILL CONTINGENCY ELEMENT

No Impact: The Oil Spill Contingency Element will not be interfered with because the project is not located along the coastal zone or coastline.

iv. EMERGENCY WATER CONTINGENCIES ANNEX AND ENERGY SHORTAGE RESPONSE PLAN

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No Impact: The Emergency Water Contingencies Annex and Energy Shortage Response Plan will not be interfered with because the project does not propose altering major water or energy supply infrastructure, such as the California Aqueduct.

v. DAM EVACUATION PLAN

No Impact: The Dam Evacuation Plan for will not be interfered with because the project is located outside a dam inundation zone.

- h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The proposed project is adjacent to wildlands that have the potential to support wildland fires. The project may significantly increase the fire hazard if the project is unable to comply with the regulations relating to emergency access, water supply, and defensible space specified in the Consolidated Fire Code for the 17 Fire Protection Districts in San Diego County and Appendix II-A, as adopted and amended by the local fire protection district. The project has a number of requirements that must be incorporated into the project design to ensure that the project will be in compliance with relevant Fire Codes. Compliance with all the fire requirements and specific details of the project's design consideration must be discussed in the context of the EIR.

- i) Expose people to significant risk of injury or death involving vectors, including mosquitoes, rats or flies?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The project does involve or support uses that will produce or collect animal waste, such as equestrian facilities and a sewer package treatment plant facility. Therefore, the project may expose people to significant risk of injury involving vectors. A Vector Management Plan must be developed and approved by the County Department of Environmental Health, Vector Surveillance

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Program to ensure people will not be exposed to vectors. The Vector Management Plan will be developed for inclusion in the EIR and analyses.

VIII. HYDROLOGY AND WATER QUALITY -- Would the project:

a) Violate any waste discharge requirements?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The project is not anticipated to violate any waste discharge requirements; however, this cannot be determined with the current information available for the proposed project. As a result, compliance with waste discharge requirements must be discussed as a part of the EIR, Stormwater Management Plan (SWMP) and technical study for hydrology as appropriate.

b) Is the project tributary to an already impaired water body, as listed on the Clean Water Act Section 303(d) list? If so, could the project result in an increase in any pollutant for which the water body is already impaired?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The project lies in the Escondido hydrologic subarea, within the Carlsbad hydrologic unit - that is impaired for Coliform bacteria, nutrients, and sediment. The project may result in an increase of pollutants for which the water body is already impaired and this potential increase must be discussed as a part of the EIR, SWMP and technical study for hydrology as appropriate.

c) Could the proposed project cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

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Potentially Significant Impact: The project is not anticipated to create or contribute runoff water that would cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives; however, this cannot be determined with the current information available for the proposed project. As a result, applicable surface or groundwater water quality objectives must be discussed as a part of the EIR, SWMP and technical study for hydrology as appropriate.

- d) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project will obtain its water supply from the Rincon Del Diablo Water District that obtains water from surface reservoirs or other imported water source. The project will not use any groundwater for any purpose, including irrigation, domestic or commercial demands. In addition, the project does not involve operations that would interfere substantially with groundwater recharge including, but not limited to the following: the project does not involve regional diversion of water to another groundwater basin; or diversion or channelization of a stream course or waterway with impervious layers, such as concrete lining or culverts, for substantial distances (e.g. ¼ mile). These activities and operations can substantially affect rates of groundwater recharge. Therefore, no impact to groundwater resources is anticipated.

- e) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The project is required to be designed to meet the performance standards of the WPO for flow control and erosion, and surface and ground water quality. Conformance to the WPO must be demonstrated in the context of the EIR, SWMP and technical study for hydrology as appropriate.

- f) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The proposed project could significantly alter established drainage patterns or significantly increase the amount of runoff. The project could have adverse effect on drainage patterns or the rate or amount of runoff because it could significantly impair, impede or accelerate flow in a watercourse or increase erosion or siltation. The project could have significant flood hazards from external sources. The applicant will be required to show lines of inundation to the 100-year flood on the existing watercourse that flows through the property, which will identify the area not to be used or disturbed. Drainage shall be diverted to either natural drainage channels or approved drainage facilities. Drainage along roads shall be per County Standards. Building pads will be shown on the plat as located outside the lines of inundation for the 100-year flood plain. The project will be required to address the above-mentioned issues and through a hydrology study be required to identify and analyze any impacts and address appropriate mitigation. Also, these issues are required to be discussed in the EIR.

- g) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The proposed project could significantly alter established drainage patterns or significantly increase the amount of runoff. The project could have adverse effect on drainage patterns or the rate or amount of runoff because it could significantly impair, impede or accelerate flow in a watercourse. The project could have significant flood hazards from external

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sources. The applicant will be required to show lines of inundation to the 100-year flood on the existing watercourse that flows through the property, which will identify the area not to be used or disturbed. Drainage shall be diverted to either natural drainage channels or approved drainage facilities. Drainage along roads shall be per County Standards. Building pads will be shown on the plat as located outside the lines of inundation for the 100-year flood plain. The project will be required to address the above-mentioned issues and through a hydrology study be required to identify and analyze any impacts and address appropriate mitigation. Also, these issues are required to be discussed in the EIR.

h) Provide substantial additional sources of polluted runoff?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The project may involve potential sources of polluted runoff. Therefore, the project must discuss proposed site design measures and/or source control BMPs and/or treatment control BMPs to be employed to reduce potential pollutants in runoff to the maximum extent practicable and to ensure compliance with applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses in the context of the EIR and SWMP.

i) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map, including County Floodplain Maps?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: Drainage swales, which are mapped on a FEMA floodplain map, a County Floodplain Map or have a watershed greater than 25 acres were identified on the project site and on off-site improvement location. Potential impacts due to flood hazards should be identified and discussed within the EIR.

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- j) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: Drainage swales, which are mapped on a FEMA floodplain map, a County Floodplain Map or have a watershed greater than 25 acres were identified on the project site and on off-site improvement location. Potential impacts due to flood hazards should be identified and discussed within the EIR.

- k) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: Drainage swales, which are mapped on a FEMA floodplain map, a County Floodplain Map or have a watershed greater than 25 acres were identified on the project site and on off-site improvement location. Potential impacts due to flood hazards should be identified and discussed within the EIR.

- l) Inundation by seiche, tsunami, or mudflow?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

i. SEICHE

No Impact: The project site is not located along the shoreline of a lake or reservoir; therefore, could not be inundated by a seiche.

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ii. TSUNAMI

No Impact: Tsunami – The project site is located more than a mile from the coast; therefore, in the event of a tsunami, would not be inundated.

iii. MUDFLOW

No Impact: Mudflow is type of landslide. The site is not located within a landslide susceptibility zone.

IX. LAND USE AND PLANNING -- Would the project:

a) Physically divide an established community?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The project will develop a new village in place of the existing rural, agricultural area. The project proposes replacement of one low-density use for another higher density use because the land is now ripe for the proposed type of development. For this reason the project is required to prepare an extended study on Land Use and Planning including an assessment of potential impacts to Community Character.

b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

1. General Plan - Regional Land Use Element

The project proposes a change from the existing Estate Development Area (EDA) Regional Category to the Current Urban Development Area (CUDA) Regional Category. The planned land uses in the vicinity are generally estate residential in nature. The area is changing with higher intensity uses developing

within the City of Escondido to the east. The existing agricultural uses within the project area do appear to be ripe for a change. The CUDA line is adjacent to the north. This line needs to be extended to include this project because the proposed densities would not be possible within the EDA. The Regional Land Use Element indicates that urban development will not occur outside the Urban Limit Line during the life of this plan; however, the end of the plan was expected to be around 1995. A comprehensive update of the General Plan is currently underway as part of GP2020. This project proposes densities and uses that are compatible with those proposed as part of this plan update.

The proposed overall density of 1.58 dwelling units per acre does not seem excessive considering that Harmony Grove is a small but fairly wide and level valley and could accommodate the higher density without extreme landform alteration.

Other amendments include changes to the Circulation Element as follows:

- A portion of Harmony Grove Road between Wigen Road and Country Club Drive is proposed to be reclassified from a Collector roadway to a Town Collector roadway.
- A portion of Country Club Drive between Harmony Grove Road and Kauana Loa Drive is proposed to be reclassified from a collector roadway to a Modified Rural Light Collector.
- A new roadway (Village Road) is proposed to connect country Club Drive to Harmony Grove Road. This roadway is proposed to be classified as a Modified Rural Light Collector.

2. Subregional Plan

The project site is located within the North County Metropolitan Subregional Plan Area. This plan was expected to end, and be updated, around 1990. Generally, it encourages annexation of areas within the sphere of influence of the City of Escondido. One of the ways to encourage annexation is to keep a low density on areas within the sphere. However, if a project has access to sewer, higher density development could be allowed. The North County Metropolitan subregional Plan does not specifically address development within Harmony Grove.

A portion of the project is subject to an "Extractive Overlay". The Regional Land Use Element discusses such overlay areas as follows:

"It is intended to be temporary in the County will initiate a General Plan Amendment to remove the extractive designation once extraction and rehabilitation is complete."

The project proposes to delete the extractive overlay and to change the land use designation to (21) Specific Plan Area. There is an existing quarry that will be rehabilitated as part of the development plans for this project. The area where the quarry is currently located is proposed to be the site of the wastewater treatment plant, in addition to a mixture of residential uses.

3. Harmony Grove Specific Plan

The concept behind this specific plan is to create a rural residential village that blends with the local landscape and responds to the objectives of neighboring residents for a distinctive single-family residential community. It provides a range of housing opportunities to accommodate broad market needs.

In its design, Harmony Grove Village recognizes a desire to live away from the rapid pulse of urban development, but also to be close enough to the advantages of city life. It creates a community that is focused on enhancing quality of life elements. It accommodates minor commercial needs and supplies an equestrian-friendly recreational environment.

At the heart of Harmony Grove Village is the Village Center, an area that mixes commercial, residential, recreational, and public uses. Employing a modified grid pattern of streets, the Village Center is the pedestrian-oriented core of Harmony Grove Village. Here, residents can stroll for neighborhood shopping or access community recreational facilities.

As development moves away from the Village Core, its density and intensity generally diminish with distance. The net result is a concentrated use pattern at the center of the community and a sparse development pattern at the perimeter.

4. Zoning

The project proposes to change the zoning so that it is consistent with the provisions of the proposed Specific Plan Area.

- a. The Land Use/Community Character Study must address all of the findings required to approve the three proposed major use permits as set forth in Section 7358 of the Zoning Ordinance.
- b. The Commercial lots that do not have a site layout and elevations proposed as part of the Major Use Permit must have Design Special Area Regulations ("D" Designator) in the Zoning to assure that future development will complement the character of the Specific Plan.

5. Subdivision Ordinance

a. Findings

The grounds for disapproval of a Tentative Map are set forth in Section 66474 of the Subdivision Map Act.

b. Design Standards

The project proposes numerous waivers of the Subdivision Design Criteria set forth in Section 81.401.

c. Access

Access to the project site is proposed from Harmony Grove Road and Country Club Drive. Village Road is also proposed which will connect with Avenida del Diablo. Potential access issues occur on lots that will share driveway access or lots that will take access from POA lots that are less than the minimum width required by the Private Road Standards. Of particular concern is Lots 108 111 and 112 that do not appear to have any road or driveway access.

Potential conflicts with the applicable land use plan, policy, or regulations must be addressed within the extended study for Land Use/Community Character and discussed within the context of the EIR.

X. MINERAL RESOURCES -- Would the project:

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

☒ Potentially Significant Impact

☐ Less than Significant Impact

☐ Potentially Significant Unless
Mitigation Incorporated

☐ No Impact

Discussion/Explanation:

Potentially Significant Impact: The project site has been classified by the California Department of Conservation – Division of Mines and Geology (Update of Mineral Land Classification: Aggregate Materials in the Western San Diego Production-Consumption Region, 1997) as an area of undetermined mineral resources MRZ-3. Staff geologist Laura Maghsoudlou has reviewed the site's geologic environment and has determined that coastal marine/non-marine granular deposits underlie a large portion of the site. Additionally, an abandoned rock quarry is present along the southeast portion of the site. Therefore, the project may result in the significant loss of availability of a known mineral resource to the region and the residents of the state. Based on these circumstances, a Geotechnical Report

will be prepared in order to determine that the project will not result in the future inaccessibility for recovery of the on-site mineral resources.

- b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: Portions of the project site are within an Extractive Use Zone (S-82) and have an Impact Sensitive Land Use Designation (24) with an Extractive Land Use Overlay (25). Staff geologist Laura Maghsoudlou has reviewed the site's geologic environment and has also evaluated the potential for non-economic value (i.e. an historical mining site). This assessment has determined that coastal marine/non-marine granular deposits underlie the site. Therefore, as discussed above in a), the project may result in the significant loss of availability of a known mineral resource and will need to be further evaluated within a Geotechnical Report and within the context of the EIR.

XI. NOISE -- Would the project result in:

- a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The project site is adjacent to and intersected by Harmony Grove Road and Country Club Drive and thus is impacted by noise from these Circulation Element roadways. Preliminary noise prediction estimates for existing roadways indicate that without site-specific noise mitigation measures, "noise sensitive" uses at the project site may be impacted by noise levels that exceed the applicable sound level limit of the Noise Element of the General Plan. The addition of a connector street between these two Circulation Element roadways may also require further noise analysis of potential noise impacts to future residences in this proposed development. In addition, the project proposes a wastewater treatment plan within Planning Area 6, which may have potential noise generation impacts.

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Policy 4b of the Noise Element of the General Plan specifies that "Whenever it appears that new development will result in any (existing or future) noise sensitive area being subjected to noise levels of CNEL equal to 60 decibels or greater, an acoustical study should be required". The Noise Element defines "noise sensitive area" as "the building site of any residence, hospital, school, library, or similar facility where quiet is an important attribute of the environment." To determine conformance a Noise Analysis must be completed for the project and must be discussed in the EIR.

- b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

- | | |
|--|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant Impact with Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project does not propose any of the following land uses that can be impacted by groundborne vibration or groundborne noise levels.

1. Buildings where low ambient vibration is essential for interior operation, including research and manufacturing facilities with special vibration constraints.
2. Residences and buildings where people normally sleep including hotels, hospitals, residences and where low ambient vibration is preferred.
3. Civic and institutional land uses including schools, churches, libraries, other institutions, and quiet office where low ambient vibration is preferred.
4. Concert halls for symphonies or other special use facilities where low ambient vibration is preferred.

Also, the project does not propose any major, new or expanded infrastructure such as mass transit, highways or major roadways or intensive extractive industry that could generate excessive groundborne vibration or groundborne noise levels on-site or in the surrounding area.

- c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The project site is adjacent to and intersected by Harmony Grove Road and Country Club Drive and thus is impacted by noise from these Circulation Element roadways. Preliminary noise prediction estimates for existing roadways indicate that without site-specific noise mitigation measures, "noise sensitive" uses at the project site may be impacted by noise levels that exceed the applicable sound level limit of the Noise Element of the General Plan. The addition of a connector street between these two Circulation Element roadways may also require further noise analysis of potential noise impacts to future residences in this proposed development. In addition, the project proposes a wastewater treatment plan within Planning Area 6, which may have potential noise generation impacts.

Policy 4b of the Noise Element of the General Plan specifies that "Whenever it appears that new development will result in any (existing or future) noise sensitive area being subjected to noise levels of CNEL equal to 60 decibels or greater, an acoustical study should be required". The Noise Element defines "noise sensitive area" as "the building site of any residence, hospital, school, library, or similar facility where quiet is an important attribute of the environment." To determine conformance a Noise Analysis must be completed for the project and must be discussed in the EIR.

- d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: Although construction operations will occur only during permitted hours of operation pursuant to Section 36-410; potential impacts may occur if construction noise limits of the County of San Diego Noise Ordinance (Section 36-410) are exceeded. To determine conformance, a Noise Analysis must be completed for the project and must be discussed in the EIR.

- e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The proposed project is not located within a Comprehensive Land Use Plan (CLUP) for airports or within 2 miles of a public airport or public use airport. Therefore, the project will not expose people residing or working in the project area to excessive airport-related noise levels.

- f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The proposed project is not located within a one-mile vicinity of a private airstrip; therefore, the project will not expose people residing or working in the project area to excessive airport-related noise levels.

XII. POPULATION AND HOUSING -- Would the project:

- a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: Growth induction is a change in physical circumstance or regulatory issues that would remove a restriction to or encourage an increase in human population or development. A project can be determined to have a growth-inducing impact if it directly or indirectly causes economic or population expansion through the removal of obstacles to growth, actions that are sometimes referred to as "growth accommodating." The proposed project includes the following aspects which may be considered to be growth inducing: an increase in residential density through general plan amendments and rezone applications, a creation of a specific plan area, major improvements to road circulation, reclassification of road segments, extension of water, gas, and electric lines, a sewage treatment facility and the proposed creation of a County Sanitation District. Growth induction can

result in a wide variety of potential impacts, which must be discussed in the context of the EIR.

- b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The proposed project would result in the removal of a number of existing single-family homes and replacement with the Harmony Grove Village project that consists of approximately 740 residential units. This project will significantly increase the number and type of housing available in the area.

- c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The current owners of the property are residents involved in agricultural uses. Their participation in this process should benefit them substantially to the extent that they would likely be able to purchase one of the new residences if they chose to stay.

XIII. PUBLIC SERVICES

- a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance service ratios, response times or other performance objectives for any of the public services:

- i. Fire protection?
- ii. Police protection?
- iii. Schools?
- iv. Parks?
- v. Other public facilities?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: Fire Protection will be provided by both the California Department of Forestry and Fire Protection and Elfin Forest CSA 107 Volunteer Fire Department. The California Department of Forestry and Fire Protection does not operate year round. They generally operate with full staffing and open fire stations each year starting in May, and reduce staffing and close fire stations in November or early December of each year depending on weather conditions. Their primary responsibility is the protection of forest, range and watershed land; however, subject to availability of firefighting resources, they may respond to structural, vehicle, and other fires within state responsibility areas. Like other fire agencies, they also respond to a variety of non-fire emergencies.

The Elfin Forest Volunteers operate year round and respond to structural, vehicle, vegetation and other fires and medical aids within the Elfin Forest area. Elfin Forest Fire Department may require facility improvements as part of this project. Specific fire protection requirements for this project are set forth in a letter to the applicant dated January 20, 2004, from Ralph Steinhoff, County Fire Services Coordinator.

The project proposes to receive water service from the Rincon del Diablo Municipal Water District except for APN#'s 222-210-03 and 222-210-05. Facilities to serve the project are reasonably expected to be available within the next 5 years based on the capital facility plan of the district. They indicate that they expect the environmental review process to include a Water Supply Assessment in accordance with Senate Bills 610 and 221.

APN#'s 222-210-03 and 222-210-05 are in the Vallecitos Water District. The District indicates that facilities to serve the project are reasonably expected to be available within the next 5 years based on the capital facility plan of the district. They indicate that they expect the environmental review process to include a Water Supply Assessment in accordance with Senate Bills 610 and 221.

The project proposes to form a new sewer district that will provide for the operation and maintenance of the proposed wastewater treatment facility. The project is required to provide complete environmental analysis, as well as policy analysis as set forth in the Public Facility Element.

The project is located within the Escondido Union School District and the Escondido Union High School District and it is eligible for service. Impacts to school facilities will be avoided by the payment of fees pursuant to State Law prior to the issuance of Building Permits.

XIV. RECREATION

- a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The project involves a residential use that will increase the use of existing neighborhood and regional parks or other recreational facilities. To avoid substantial physical deterioration of local recreation facilities the project will be required to pay fees or dedicate land for local parks to the County pursuant to the Park Land Dedication Ordinance (PLDO). The Park Land Dedication Ordinance (PLDO) is the mechanism that enables the funding or dedication of local parkland in the County. The PLDO establishes several methods by which developers may satisfy their park requirements. Options include the payment of park fees, the dedication of a public park, the provision of private recreational facilities, or a combination of these methods. PLDO funds must be used for the acquisition, planning, and development of local parkland and recreation facilities. Local parks are intended to serve the recreational needs of the communities in which they are located. The proposed project opted to provide a combination of public and private recreational facilities, as well as pay PLDO fees. Therefore, the project meets the requirements set forth by the PLDO for adequate parkland dedication and thereby reducing impacts, including cumulative impacts to local recreational facilities. The project will not result in significant cumulative impacts, because all past, present and future residential projects are required to comply with the requirements of PLDO. Refer to XVII. Mandatory Findings of Significance for a comprehensive list of the projects considered.

There is an existing surplus of County Regional Parks. Currently, there is over 21,765 acres of regional parkland owned by the County, which far exceeds the General Plan standard of 15 acres per 1,000 population. In addition, there are over one million acres of publicly owned land in San Diego County dedicated to parks or open space including Federal lands, State Parks, special districts, and regional river parks. Due to the extensive surplus of existing publicly owned lands that can be used for recreation the project will not result in substantial physical deterioration of regional recreational facilities or accelerate the deterioration of regional parkland.

Moreover, the project will not result any cumulatively considerable deterioration or accelerated deterioration of regional recreation facilities because even with all past, present and future residential projects a significant surplus of regional recreational facilities will remain.

- b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The project involves new recreational facilities. The new facilities include three public parks, a series of private neighborhood parks, a community equestrian facility and a system of public multi-use trails. Therefore, the construction of recreational facilities may have an adverse physical effect on the environment and must be addressed within the appropriate technical studies and analyzed in the EIR.

XV. TRANSPORTATION/TRAFFIC -- Would the project:

- a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The project will generate an expected ADT of 9,132. The addition of 9,132 ADT may result in a substantial increase in the number of vehicle trips, volume of capacity ratio on roads, or congestion at intersections in relation to existing conditions. Therefore, the proposal could result in an increase in traffic, which is substantial in relation to the existing traffic load and capacity. As a result the EIR and Traffic Analysis are required to analyze the impact of the traffic generated by the project on County & State roads in the area.

- b) Exceed, either individually or cumulatively, a level of service standard established by the County congestion management agency for designated roads or highways?

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- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The project will generate an expected ADT of 9,132. The addition of 9,132 ADT may result in a substantial increase in the number of vehicle trips, volume of capacity ratio on roads, or congestion at intersections in relation to existing conditions. Therefore, the proposal could result in a potential degradation of the level of service standard established by the County congestion management agency for designated roads or highways. As a result the EIR and Traffic Analysis are required to analyze the impact of the traffic generated by the project on County & State roads in the area.

- c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The proposed project is located outside of an Airport Master Plan Zone and is not adjacent to any public or private airports; therefore, the project will not result in a change in air traffic patterns.

- d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The proposed project will not place incompatible uses (e.g., farm equipment) on existing roadways; however, road design features along county roads from project accesses must be determined in the sight distance study within the Traffic Analysis. The EIR and Traffic Analysis must determine whether the project increases traffic hazards and provides adequate sight distance for the project.

e) Result in inadequate emergency access?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The proposed project will not result in inadequate emergency access. The project is not served by a dead-end road that exceeds the maximum cumulative length permitted by the Consolidated Fire Code for the 17 Fire Protection Districts in San Diego County; therefore, the project has adequate emergency access.

f) Result in inadequate parking capacity?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The Zoning Ordinance Section 6758 Parking Schedule requires two on-site parking spaces for each dwelling unit. The proposed lots have sufficient area to provide at least two on-site parking spaces consistent with the Zoning Ordinance.

In addition, the various non-residential uses have been provided with adequate parking area or will be subject to subsequent building permits that will ensure adequate parking area for each use.

g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The project does not propose any hazards or barriers for pedestrians or bicyclists. Any required improvements will be constructed to maintain existing conditions as it relates to pedestrians and bicyclists.

XVI. UTILITIES AND SERVICE SYSTEMS -- Would the project:

- a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The project proposes to discharge domestic waste to on-site wastewater systems (OSWS), also known as septic systems. The Private Equestrian Ranch (Planning Area 7) proposes to utilize a septic system for effluent treatment/disposal. Discharged wastewater must conform to the Regional Water Quality Control Board's (RWQCB) applicable standards, including the Regional Basin Plan and the California Water Code. California Water Code Section 13282 allows RWQCBs to authorize a local public agency to issue permits for OSWS "to ensure that systems are adequately designed, located, sized, spaced, constructed and maintained." The RWQCBs with jurisdiction over San Diego County have authorized the County of San Diego, Department of Environmental Health (DEH) to issue certain OSWS permits throughout the County and within the incorporated cities. DEH will be required to review the OSWS lay-out for the project pursuant to DEH, Land and Water Quality Division's, "On-site Wastewater Systems: Permitting Process and Design Criteria." The EIR must identify if the project is consistent with the wastewater treatment requirements of the RWQCB, including the Regional Basin Plan.

- b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The project involves new and/or expanded water or wastewater treatment facilities. The new and/or expanded facilities include a sewage treatment plant and a network of underground gravity sewer lines. The proposed sewage treatment plant is to be located in the southwest portion of Planning Area 6. The proposed water service will be a system of underground waterlines within the project. Existing waterlines within the site will be removed and

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replaced. These new and/or expanded facilities may result in adverse physical effect on the environment. Potential environmental impacts must be addressed within the appropriate technical studies and analyzed in the EIR.

- c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The project does include new or expanded stormwater drainage facilities. Moreover, the project does involve landform modification any source, treatment or structural Best Management Practices for stormwater. These new and/or expanded facilities may result in adverse physical effect on the environment. Potential environmental impacts must be addressed within the appropriate technical studies and analyzed in the EIR.

- d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The proposed project site is included in the San Diego County Water Authority (SDCWA) boundary line. The majority of the site is within the Rincon del Diablo Municipal Water District (RdDMWD) with the remainder of the site in the Vallecitos Water District. Although, water service availability letters have been received from both water districts, a state mandated water supply assessment is required to determine the projects long-term water supply availability. This assessment will be included and analyzed within the EIR.

- e) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The project proposes to form a County Sanitation District (Harmony Grove Village Specific Plan Sanitation District), in addition to a wastewater treatment facility, to provide wastewater treatment and reclamation service. The provision of adequate wastewater treatment facilities should be assured through a Sanitation Agreement entered into between the project applicants and the County of San Diego. However, the details of that agreement regarding adequate wastewater capacity must be identified and disclosed within the EIR and appropriate technical studies.

- f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: Implementation of the project will generate solid waste. All solid waste facilities, including landfills require solid waste facility permits to operate. In San Diego County, the County Department of Environmental Health, Local Enforcement Agency issues solid waste facility permits with concurrence from the California Integrated Waste Management Board (CIWMB) under the authority of the Public Resources Code (Sections 44001-44018) and California Code of Regulations Title 27, Division 2, Subdivision 1, Chapter 4 (Section 21440et seq.). There are five, permitted active landfills in San Diego County with remaining capacity. Therefore, there is sufficient existing permitted solid waste capacity to accommodate the project's solid waste disposal needs.

- g) Comply with federal, state, and local statutes and regulations related to solid waste?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: Implementation of the project will generate solid waste. All solid waste facilities, including landfills require solid waste facility permits to operate. In San Diego County, the County Department of Environmental Health, Local Enforcement Agency issues solid waste facility permits with concurrence from the California Integrated Waste Management Board (CIWMB) under the authority of the Public Resources Code (Sections 44001-44018) and California Code of Regulations Title 27, Division 2, Subdivision 1, Chapter 4 (Section 21440et seq.). The project will deposit all solid waste at a permitted solid waste facility and therefore, will comply with Federal, State, and local statutes and regulations related to solid waste.

XVII. MANDATORY FINDINGS OF SIGNIFICANCE:

- a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

☒ Potentially Significant Impact

☐ Less than Significant Impact

☐ Potentially Significant Unless
Mitigation Incorporated

☐ No Impact

Discussion/Explanation:

Potentially Significant Impact: Per the instructions for evaluating environmental impacts in this Initial Study, the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory were considered in the response to each question in sections IV and V of this form. In addition to project specific impacts, this evaluation considered the projects potential for significant cumulative effects. As a result of this evaluation, the project was determined to have potential significant effects related to Aesthetics, Agricultural Resources, Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Population and Housing, Public Services, Recreation, Transportation/Traffic, Utilities and Service Systems. While mitigation has been proposed in some instances that reduce these effects to a level below significance, the effectiveness of this mitigation to clearly reduce the impact to a level below significance is unclear. Therefore, this project has been determined to potentially meet this Mandatory Finding of Significance.

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- b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: Per the instructions for evaluating environmental impacts in this Initial Study, the potential for adverse cumulative effects were considered in the response to each question in sections I through XVI of this form. In addition to project specific impacts, this evaluation considered the projects potential for incremental effects that are cumulatively considerable. As a result of this evaluation, there were determined to be potentially significant cumulative effects related to Aesthetics, Agricultural Resources, Air Quality, Biological Resources, Cultural Resources, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Population and Housing, Public Services, Recreation, Transportation/Traffic, Utilities and Service Systems. While mitigation has been proposed in some instances that reduce these cumulative effects to a level below significance, the effectiveness of this mitigation to clearly reduce the impact to a level below significance is unclear. Therefore, this project has been determined to potentially meet this Mandatory Finding of Significance.

- c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: In the evaluation of environmental impacts in this Initial Study, the potential for adverse direct or indirect impacts to human beings were considered in the response to certain questions in sections I. Aesthetics, III. Air Quality, VI. Geology and Soils, VII. Hazards and Hazardous Materials, VIII Hydrology and Water Quality XI. Noise, XII. Population and Housing, and XV. Transportation and Traffic. As a result of this evaluation, there were determined to be potentially significant effects related to Aesthetics, Agricultural Resources, Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Mineral

Resources, Noise, Population and Housing, Public Services, Recreation, Transportation/Traffic, Utilities and Service Systems. While mitigation has been proposed in some instances that reduce these significant effects to a level below significance, the effectiveness of this mitigation to clearly reduce the impact to a level below significance is unclear. Therefore, this project has been determined to potentially meet this Mandatory Finding of Significance.

XVIII. REFERENCES USED IN THE COMPLETION OF THE INITIAL STUDY CHECKLIST

All references to Federal, State and local regulation are available on the Internet. For Federal regulation refer to <http://www4.law.cornell.edu/uscode/>. For State regulation refer to www.leginfo.ca.gov. For County regulation refer to www.amlegal.com. All other references are available upon request.

AESTHETICS

California Street and Highways Code [California Street and Highways Code, Section 260-283.
(<http://www.leginfo.ca.gov/>)

California Scenic Highway Program, California Streets and Highways Code, Section 260-283.
(<http://www.dot.ca.gov/hq/LandArch/scenic/scpr.htm>)

County of San Diego, Department of Planning and Land Use. The Zoning Ordinance of San Diego County. Sections 5200-5299; 5700-5799; 5900-5910.
(www.co.san-diego.ca.us)

County of San Diego, Board Policy I-73: Hillside Development Policy. (www.co.san-diego.ca.us)

County of San Diego, Board Policy I-104: Policy and Procedures for Preparation of Community Design Guidelines, Section 396.10 of the County Administrative Code and Section 5750 et seq. of the County Zoning Ordinance. (www.co.san-diego.ca.us)

County of San Diego, General Plan, Scenic Highway Element VI and Scenic Highway Program. (ceres.ca.gov)

County of San Diego Light Pollution Code, Title 5, Division 9 (Sections 59.101-59.115 of the County Code of Regulatory Ordinances) as added by Ordinance No 6900, effective January 18, 1985, and amended July 17, 1986 by Ordinance No. 7155. (www.amlegal.com)

County of San Diego Wireless Communications Ordinance [San Diego County Code of Regulatory Ordinances.
(www.amlegal.com)

Design Review Guidelines for the Communities of San Diego County. (Alpine, Bonsall, Fallbrook, Julian, Lakeside, Ramona, Spring Valley, Sweetwater, Valley Center).

Federal Communications Commission, Telecommunications Act of 1996 [Telecommunications Act of 1996, Pub. LA. No. 104-104, 110 Stat. 56 (1996).
(<http://www.fcc.gov/Reports/tcom1996.txt>)

Institution of Lighting Engineers, Guidance Notes for the Reduction of Light Pollution, Warwickshire, UK, 2000
(<http://www.dark-skies.org/ile-gd-e.htm>)

International Light Inc., Light Measurement Handbook, 1997.
(www.intl-light.com)

Rensselaer Polytechnic Institute, Lighting Research Center, National Lighting Product Information Program (NLPIP), Lighting Answers, Volume 7, Issue 2, March 2003.
(www.lrc.rpi.edu)

US Census Bureau, Census 2000, Urbanized Area Outline Map, San Diego, CA.
(<http://www.census.gov/geo/www/maps/ua2kmaps.htm>)

US Department of the Interior, Bureau of Land Management (BLM) modified Visual Management System.
(www.blm.gov)

US Department of Transportation, Federal Highway Administration (FHWA) Visual Impact Assessment for Highway Projects.

US Department of Transportation, National Highway System Act of 1995 [Title III, Section 304. Design Criteria for the National Highway System.
(<http://www.fhwa.dot.gov/legregs/nhsdatoc.html>)

AGRICULTURE RESOURCES

California Department of Conservation, Farmland Mapping and Monitoring Program, "A Guide to the Farmland Mapping and Monitoring Program," November 1994.
(www.consrv.ca.gov)

California Department of Conservation, Office of Land Conversion, "California Agricultural Land Evaluation and Site Assessment Model Instruction Manual," 1997.
(www.consrv.ca.gov)

California Farmland Conservancy Program, 1996.
(www.consrv.ca.gov)

California Land Conservation (Williamson) Act, 1965.
(www.ceres.ca.gov, www.consrv.ca.gov)

California Right to Farm Act, as amended 1996.
(www.qp.gov.bc.ca)

County of San Diego Agricultural Enterprises and Consumer Information Ordinance, 1994, Title 6, Division 3, Ch. 4. Sections 63.401-63.408. (www.amlegal.com)

County of San Diego, Department of Agriculture, Weights and Measures, "2002 Crop Statistics and Annual Report," 2002. (www.sdcountry.ca.gov)

United States Department of Agriculture, Natural Resource Conservation Service LESA System. (www.nrcs.usda.gov, www.swcs.org).

United States Department of Agriculture, Soil Survey for the San Diego Area, California. 1973. (soils.usda.gov)

AIR QUALITY

CEQA Air Quality Analysis Guidance Handbook, South Coast Air Quality Management District, Revised November 1993. (www.aqmd.gov)

County of San Diego Air Pollution Control District's Rules and Regulations, updated August 2003. (www.co.san-diego.ca.us)

Federal Clean Air Act US Code; Title 42; Chapter 85 Subchapter 1. (www4.law.cornell.edu)

BIOLOGY

California Department of Fish and Game (CDFG). Southern California Coastal Sage Scrub Natural Community Conservation Planning Process Guidelines. CDFG and California Resources Agency, Sacramento, California. 1993. (www.dfg.ca.gov)

County of San Diego, An Ordinance Amending the San Diego County Code to Establish a Process for Issuance of the Coastal Sage Scrub Habitat Loss Permits and Declaring the Urgency Thereof to Take Effect Immediately, Ordinance No. 8365. 1994, Title 8, Div 6, Ch. 1. Sections 86.101-86.105, 87.202.2. (www.amlegal.com)

County of San Diego, Biological Mitigation Ordinance, Ord. Nos. 8845, 9246, 1998 (new series). (www.co.san-diego.ca.us)

County of San Diego, Implementing Agreement by and between United States Fish and Wildlife Service, California Department of Fish and Game and County of San Diego. County of San Diego, Multiple Species Conservation Program, 1998.

County of San Diego, Multiple Species Conservation Program, County of San Diego Subarea Plan, 1997.

Holland, R.R. Preliminary Descriptions of the Terrestrial Natural Communities of California. State of California, Resources Agency, Department of Fish and Game, Sacramento, California, 1986.

Memorandum of Understanding [Agreement Between United States Fish and Wildlife Service (USFWS), California Department of Fish and Game (CDFG), California Department of Forestry and Fire Protection (CDF), San Diego County Fire Chief's Association and the Fire District's Association of San Diego County.

Stanislaus Audubon Society, Inc. v County of Stanislaus (5th Dist. 1995) 33 Cal.App.4th 144, 155-159 [39 Cal. Rptr.2d 54]. (www.ceres.ca.gov)

U.S. Army Corps of Engineers Environmental Laboratory. Corps of Engineers Wetlands Delineation Manual. U.S. Army Corps of Engineers, Wetlands Research Program

Technical Report Y-87-1. 1987. (<http://www.wes.army.mil/>)

U.S. Environmental Protection Agency. America's wetlands: our vital link between land and water. Office of Water, Office of Wetlands, Oceans and Watersheds. EPA843-K-95-001. 1995b. (www.epa.gov)

U.S. Fish and Wildlife Service and National Marine Fisheries Service. Habitat Conservation Planning Handbook. Department of Interior, Washington, D.C. 1996. (endangered.fws.gov)

U.S. Fish and Wildlife Service and National Marine Fisheries Service. Consultation Handbook: Procedures for Conducting Consultation and Conference Activities Under Section 7 of the Endangered Species Act. Department of Interior, Washington, D.C. 1998. (endangered.fws.gov)

U.S. Fish and Wildlife Service. Environmental Assessment and Land Protection Plan for the Vernal Pools Stewardship Project. Portland, Oregon. 1997.

U.S. Fish and Wildlife Service. Vernal Pools of Southern California Recovery Plan. U.S. Department of Interior, Fish and Wildlife Service, Region One, Portland, Oregon, 1998. (ecos.fws.gov)

U.S. Fish and Wildlife Service. Birds of conservation concern 2002. Division of Migratory. 2002. (migratorybirds.fws.gov)

CULTURAL RESOURCES

California Health & Safety Code. §18950-18961, State Historic Building Code. (www.leginfo.ca.gov)

California Health & Safety Code. §5020-5029, Historical Resources. (www.leginfo.ca.gov)

California Health & Safety Code. §7050.5, Human Remains. (www.leginfo.ca.gov)

California Native American Graves Protection and Repatriation Act, (AB 978), 2001. (www.leginfo.ca.gov)

California Public Resources Code §5024.1, Register of Historical Resources. (www.leginfo.ca.gov)

California Public Resources Code. §5031-5033, State Landmarks. (www.leginfo.ca.gov)

California Public Resources Code. §5097-5097.6, Archaeological, Paleontological, and Historic Sites. (www.leginfo.ca.gov)

California Public Resources Code. §5097.9-5097.991, Native American Heritage. (www.leginfo.ca.gov)

City of San Diego. Paleontological Guidelines. (revised) August 1998.

County of San Diego, Local Register of Historical Resources (Ordinance 9493), 2002. (www.co.san-diego.ca.us)

Demere, Thomas A., and Stephen L. Walsh. Paleontological Resources San Diego County. Department of Paleontology, San Diego Natural History Museum. 1994.

Moore, Ellen J. Fossil Mollusks of San Diego County. San Diego Society of Natural history. Occasional; Paper 15. 1968.

U.S. Code including: American Antiquities Act (16 USC §431-433) 1906. Historic Sites, Buildings, and Antiquities

Act (16 USC §461-467), 1935. Reservoir Salvage Act (16 USC §469-469c) 1960. Department of Transportation Act (49 USC §303) 1966. National Historic Preservation Act (16 USC §470 et seq.) 1966. National Environmental Policy Act (42 USC §4321) 1969. Coastal Zone Management Act (16 USC §1451) 1972. National Marine Sanctuaries Act (16 USC §1431) 1972. Archaeological and Historical Preservation Act (16 USC §469-469c) 1974. Federal Land Policy and Management Act (43 USC §35) 1976. American Indian Religious Freedom Act (42 USC §1996 and 1996a) 1978. Archaeological Resources Protection Act (16 USC §470aa-mm) 1979. Native American Graves Protection and Repatriation Act (25 USC §3001-3013) 1990. Intermodal Surface Transportation Efficiency Act (23 USC §101, 109) 1991. American Battlefield Protection Act (16 USC 469k) 1996. (www4.law.cornell.edu)

GEOLOGY & SOILS

California Department of Conservation, Division of Mines and Geology, California Alquist-Priolo Earthquake Fault Zoning Act, Special Publication 42, Revised 1997. (www.consrv.ca.gov)

California Department of Conservation, Division of Mines and Geology, Fault-Rupture Hazard Zones in California, Special Publication 42, revised 1997. (www.consrv.ca.gov)

California Department of Conservation, Division of Mines and Geology, Special Publication 117, Guidelines for Evaluating and Mitigating Seismic Hazards in California, 1997. (www.consrv.ca.gov)

County of San Diego Code of Regulatory Ordinances Title 6, Division 8, Chapter 3, Septic Ranks and Seepage Pits. (www.amlegal.com)

County of San Diego Department of Environmental Health, Land and Water Quality Division, February 2002. On-site Wastewater Systems (Septic Systems): Permitting Process and Design Criteria. (www.sdcountry.ca.gov)

County of San Diego Natural Resource Inventory, Section 3, Geology.

United States Department of Agriculture, Soil Survey for the San Diego Area, California. 1973. (soils.usda.gov)

HAZARDS & HAZARDOUS MATERIALS

American Planning Association, Zoning News, "Saving Homes from Wildfires: Regulating the Home Ignition Zone," May 2001.

California Building Code (CBC), Seismic Requirements, Chapter 16 Section 162. (www.buildersbook.com)

California Education Code, Section 17215 and 81033. (www.leginfo.ca.gov)

California Government Code. § 8585-8589, Emergency Services Act. (www.leginfo.ca.gov)

California Hazardous Waste and Substances Site List. April 1998. (www.dtsc.ca.gov)

California Health & Safety Code Chapter 6.95 and §25117 and §25316. (www.leginfo.ca.gov)

California Health & Safety Code § 2000-2067. (www.leginfo.ca.gov)

California Health & Safety Code. §17922.2. Hazardous Buildings. (www.leginfo.ca.gov)

California Public Utilities Code, SDCRAA. Public Utilities Code, Division 17, Sections 170000-170084. (www.leginfo.ca.gov)

California Resources Agency, "OES Dam Failure Inundation Mapping and Emergency Procedures Program", 1996. (ceres.ca.gov)

County of San Diego, Consolidated Fire Code Health and Safety Code §13869.7, including Ordinances of the 17 Fire Protection Districts as Ratified by the San Diego County Board of Supervisors, First Edition, October 17, 2001 and Amendments to the Fire Code portion of the State Building Standards Code, 1998 Edition.

County of San Diego, Department of Environmental Health Community Health Division Vector Surveillance and Control. Annual Report for Calendar Year 2002. March 2003. (www.sdcountry.ca.gov)

County of San Diego, Department of Environmental Health, Hazardous Materials Division. California Accidental Release Prevention Program (CalARP) Guidelines. (<http://www.sdcountry.ca.gov>), (www.oes.ca.gov)

County of San Diego, Department of Environmental Health, Hazardous Materials Division. Hazardous Materials Business Plan Guidelines. (www.sdcountry.ca.gov)

County of San Diego Code of Regulatory Ordinances, Title 3, Div 5, CH. 3, Section 35.39100.030, Wildland/Urban Interface Ordinance, Ord. No.9111, 2000. (www.amlegal.com)

Robert T. Stafford Disaster Relief and Emergency Assistance Act as amended October 30, 2000, US Code, Title 42, Chapter 68, 5121, et seq. (www4.law.cornell.edu)

Unified San Diego County Emergency Services Organization Operational Area Emergency Plan, March 2000.

Unified San Diego County Emergency Services Organization Operational Area Energy Shortage Response Plan, June 1995.

Uniform Building Code. (www.buildersbook.com)

Uniform Fire Code 1997 edition published by the Western Fire Chiefs Association and the International Conference of Building Officials, and the National Fire Protection Association Standards 13 & 13-D, 1996 Edition, and 13-R, 1996 Edition. (www.buildersbook.com)

HYDROLOGY & WATER QUALITY

American Planning Association, Planning Advisory Service Report Number 476 Non-point Source Pollution: A Handbook for Local Government

California Department of Water Resources, California Water Plan Update. Sacramento: Dept. of Water Resources State of California. 1998. (rubicon.water.ca.gov)

California Department of Water Resources, California's Groundwater Update 2003 Bulletin 118, April 2003. (www.groundwater.water.ca.gov)

California Department of Water Resources, Water Facts, No. 8, August 2000. (www.dpla2.water.ca.gov)

California Disaster Assistance Act. Government Code, § 8680-8692. (www.leginfo.ca.gov)

California State Water Resources Control Board, NPDES General Permit Nos. CAS000001 INDUSTRIAL ACTIVITIES (97-03-DWQ) and CAS000002 Construction Activities (No. 99-08-DWQ) (www.swrcb.ca.gov)

California Storm Water Quality Association, California Storm Water Best Management Practice Handbooks, 2003.

California Water Code, Sections 10754, 13282, and 60000 et seq. (www.leginfo.ca.gov)

Colorado River Basin Regional Water Quality Control Board, Region 7, Water Quality Control Plan. (www.swrcb.ca.gov)

County of San Diego Regulatory Ordinance, Title 8, Division 7, Grading Ordinance. Grading, Clearing and Watercourses. (www.amlegal.com)

County of San Diego, Groundwater Ordinance. #7994. (www.sdcountry.ca.gov, <http://www.amlegal.com/>.)

County of San Diego, Project Clean Water Strategic Plan, 2002. (www.projectcleanwater.org)

County of San Diego, Watershed Protection, Storm Water Management, and Discharge Control Ordinance, Ordinance Nos. 9424 and 9426. Chapter 8, Division 7, Title 6 of the San Diego County Code of Regulatory Ordinances and amendments. (www.amlegal.com)

County of San Diego. Board of Supervisors Policy I-68. Diego Proposed Projects in Flood Plains with Defined Floodways. (www.co.san-diego.ca.us)

Federal Water Pollution Control Act (Clean Water Act), 1972, Title 33, Ch.26, Sub-Ch.1. (www4.law.cornell.edu)

Freeze, Allan and Cherry, John A., Groundwater, Prentice-Hall, Inc. New Jersey, 1979.

Heath, Ralph C., Basic Ground-Water Hydrology, United States Geological Survey Water-Supply Paper; 2220, 1991.

National Flood Insurance Act of 1968. (www.fema.gov)

National Flood Insurance Reform Act of 1994. (www.fema.gov)

Porter-Cologne Water Quality Control Act, California Water Code Division 7. Water Quality. (ceres.ca.gov)

San Diego Association of Governments, Water Quality Element, Regional Growth Management Strategy, 1997. (www.sandag.org)

San Diego Regional Water Quality Control Board, NPDES Permit No. CAS0108758. (www.swrcb.ca.gov)

San Diego Regional Water Quality Control Board, Water Quality Control Plan for the San Diego Basin. (www.swrcb.ca.gov)

LAND USE & PLANNING

California Department of Conservation Division of Mines and Geology, Open File Report 96-04, Update of Mineral Land Classification: Aggregate Materials in the Western San Diego County Production Consumption Region, 1996. (www.consrv.ca.gov)

California Environmental Quality Act, CEQA Guidelines, 2003. (ceres.ca.gov)

California Environmental Quality Act, Public Resources Code 21000-21178; California Code of Regulations, Guidelines for Implementation of CEQA, Appendix G, Title 14, Chapter 3, §15000-15387. (www.leginfo.ca.gov)

California General Plan Glossary of Terms, 2001. (ceres.ca.gov)

California State Mining and Geology Board, SP 51, California Surface Mining and Reclamation Policies and Procedures, January 2000. (www.consrv.ca.gov)

County of San Diego Code of Regulatory Ordinances, Title 8, Zoning and Land Use Regulations. (www.amlegal.com)

County of San Diego, Board of Supervisors Policy I-84: Project Facility. (www.sdcountry.ca.gov)

County of San Diego, Board Policy I-38, as amended 1989. (www.sdcountry.ca.gov)

County of San Diego, Department of Planning and Land Use. The Zoning Ordinance of San Diego County. (www.co.san-diego.ca.us)

County of San Diego, General Plan as adopted and amended from September 29, 1971 to April 5, 2000. (ceres.ca.gov)

County of San Diego. Resource Protection Ordinance, compilation of Ord.Nos. 7968, 7739, 7685 and 7631. 1991.

Design Review Guidelines for the Communities of San Diego County.

Guide to the California Environmental Quality Act (CEQA) by Michael H. Remy, Tina A. Thomas, James G. Moore, and Whitman F. Manley, Point Arena, CA: Solano Press Books, 1999. (ceres.ca.gov)

MINERAL RESOURCES

National Environmental Policy Act, Title 42, 36.401 et. seq. 1969. (www4.law.cornell.edu)

Subdivision Map Act, 2003. (ceres.ca.gov)

U.S. Geologic Survey, Causey, J. Douglas, 1998, MAS/MILS Mineral Location Database.

U.S. Geologic Survey, Frank, David G., 1999, (MRDS) Mineral Resource Data System.

NOISE

California State Building Code, Part 2, Title 24, CCR, Appendix Chapter 3, Sound Transmission Control, 1988. . (www.buildersbook.com)

County of San Diego Code of Regulatory Ordinances, Title 3, Div 6, Chapter 4, Noise Abatement and Control, effective February 4, 1982. (www.amlegal.com)

County of San Diego General Plan, Part VIII, Noise Element, effective December 17, 1980. (ceres.ca.gov)

Federal Aviation Administration, Federal Aviation Regulations, Part 150 Airport Noise Compatibility Planning (revised January 18, 1985). (<http://www.access.gpo.gov/>)

Harris Miller Miller and Hanson Inc., *Transit Noise and Vibration Impact Assessment*, April 1995.
(<http://ntl.bts.gov/data/rail05/rail05.html>)

International Standard Organization (ISO), ISO 362; ISO 1996 1-3; ISO 3095; and ISO 3740-3747. (www.iso.ch)

U.S. Department of Transportation, Federal Highway Administration, Office of Environment and Planning, Noise and Air Quality Branch. "Highway Traffic Noise Analysis and Abatement Policy and Guidance," Washington, D.C., June 1995. (<http://www.fhwa.dot.gov/>)

POPULATION & HOUSING

Housing and Community Development Act of 1974, 42 USC 5309, Title 42--The Public Health And Welfare, Chapter 69--Community Development, United States Congress, August 22, 1974. (www4.law.cornell.edu)

National Housing Act (Cranston-Gonzales), Title 12, Ch. 13. (www4.law.cornell.edu)

San Diego Association of Governments Population and Housing Estimates, November 2000. (www.sandag.org)

US Census Bureau, Census 2000. (<http://www.census.gov/>)

RECREATION

County of San Diego Code of Regulatory Ordinances, Title 8, Division 10, Chapter PLDO, §810.101 et seq. Park Lands Dedication Ordinance. (www.amlegal.com)

TRANSPORTATION/TRAFFIC

California Aeronautics Act, Public Utilities Code, Section 21001 et seq. (www.leginfo.ca.gov)

California Department of Transportation, Division of Aeronautics, California Airport Land Use Planning Handbook, January 2002.

California Department of Transportation, Environmental Program Environmental Engineering – Noise, Air Quality, and Hazardous Waste Management Office. "Traffic Noise Analysis Protocol for New Highway Construction and Reconstruction Projects," October 1998.
(www.dot.ca.gov)

California Public Utilities Code, SDCRAA. Public Utilities Code, Division 17, Sections 170000-170084.
(www.leginfo.ca.gov)

California Street and Highways Code. California Street and Highways Code, Section 260-283. (www.leginfo.ca.gov)

Office of Planning, Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Final Report, April 1995.

San Diego Association of Governments, 2020 Regional Transportation Plan. Prepared by the San Diego Association of Governments. (www.sandag.org)

San Diego Association of Governments, Comprehensive Land Use Plan for Borrego Valley Airport (1986), Brown Field (1995), Fallbrook Community Airpark (1991), Gillespie Field (1989), McClellan-Palomar Airport (1994). (www.sandag.org)

US Code of Federal Regulations, Federal Aviation Regulations (FAR), Objects Affecting Navigable Airspace, Title 14, Chapter 1, Part 77. (www.gpoaccess.gov)

UTILITIES & SERVICE SYSTEMS

California Code of Regulations (CCR), Title 14. Natural Resources Division, CIWMB Division 7; and Title 27, Environmental Protection Division 2, Solid Waste.
(ccr.oal.ca.gov)

California Integrated Waste Management Act. Public Resources Code, Division 30, Waste Management, Sections 40000-41956. (www.leginfo.ca.gov)

County of San Diego, Board of Supervisors Policy I-78: Small Wastewater. (www.sdcountry.ca.gov)

Unified San Diego County Emergency Services Organization Annex T Emergency Water Contingencies, October 1992.
(www.co.san-diego.ca.us)

United States Department of Agriculture, Natural Resource Conservation Service LESA System.

United States Department of Agriculture, Soil Survey for the San Diego Area, California. 1973.

US Census Bureau, Census 2000.

US Code of Federal Regulations, Federal Aviation Regulations (FAR), Objects Affecting Navigable Airspace, Title 14, Chapter 1, Part 77.

US Department of the Interior, Bureau of Land Management (BLM) modified Visual Management System.

US Department of Transportation, Federal Highway Administration (FHWA) Visual Impact Assessment for Highway Projects.

ND0704\0408011-ISF

GARY L. PRYOR
DIRECTOR



County of San Diego

DEPARTMENT OF PLANNING AND LAND USE

5201 RUFFIN ROAD, SUITE B, SAN DIEGO, CALIFORNIA 92123-1666
INFORMATION (858) 694-2960
TOLL FREE (800) 411-0017

SAN MARCOS OFFICE
338 VIA VERA CRUZ - SUITE 201
SAN MARCOS, CA 92069-2620
(760) 471-0730

EL CAJON OFFICE
200 EAST MAIN ST. - SIXTH FLOOR
EL CAJON, CA 92020-3912
(619) 441-4030

August 12, 2004

New Urban West Management, LLC
Attention: Tom Zanic
520 Broadway, Suite 100
Santa Monica, California 90401

RE: TRANSMITTAL OF NOTICE OF PREPARATION COMMENTS -
HARMONY GROVE VILLAGE, GPA 04-04; REZ 04-010; SP 04-03; TM 5365;
P04-012; P04-013; P04-014; ER 04-08-011

Dear Mr. Zanic:

The Department of Planning and Land Use (DPLU) has circulated for public review a "Notice of Preparation" for the Environmental Impact Report (EIR) for your proposed project. Attached you will find the correspondence received. A copy of the Notice of Preparation and the comments received must be included in the appendices of the EIR. Please forward this information to your EIR consultant so that the salient comments raised can be addressed in the draft EIR.


If you have any specific questions regarding the above, please contact Kristin Blackson, Project Environmental Analyst at (858) 694-3012 or e-mail at kristin.blackson@sdcounty.ca.gov.

PROJECT SCHEDULE : Your project is presently on schedule. An updated copy of your project schedule is attached showing an estimated hearing/decision date of July 3, 2006.

SUBMITTAL REQUIREMENTS/DATE: Please comply with the submittal requirements and due date as outlined in the "Request for Environmental Impact Report" letter from DPLU dated June 15, 2004.

If you have any questions regarding this request, please contact me at (858) 694-3913 or by e-mail at william.stocks@sdcounty.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'William Stocks', with a long horizontal flourish extending to the right.

WILLIAM STOCKS, Project Manager
Regulatory Planning Division

WS:kb

Attachments:

Notice of Preparation Comments
Revised Project Schedule

cc: New Urban West, Inc., Atten: Linda Bailey, 120 W. Brand Ave., Suite 104,
Escondido, CA 92025
Rick Engineering, Atten: Steve Silverman and Tim Murphy, 5620 Friars Rd., San
Diego, CA 92110
Helix Environmental Planning, Inc., Atten: Ellen Darnell, 8100 La Mesa Blvd.,
Suite 150, La Mesa, CA 91941-6476
Veronica Garmo; Department of Environmental Health, Hazardous Materials
Division; 1255 Imperial Avenue, P.O. Box 129261; San Diego, CA 92112
Lee Shick, Project Manager, Department of Public Works, M.S. 0336
Marette Esperance, Planning Manager, Department of Public Planning and Land
Use, M.S. 0650
Kristin Blackson, Project Analyst/EIR Assistant, Department of Planning and
Land Use, M.S. 0650
Glenn Russell, Planning Manager, Department of Planning and Land Use,
M.S. 0650
Paul Mehnert, County Counsel, M.S. A12

ESTIMATED PROCESSING SCHEDULE

Project Name: Harmony Grove Village
 Project Number: GPA 04-04; REZ 04-010; SP 04-03; TM 5365; P04-012; P04-013; P04-014; ER 04-08-011
 Staff Completing Schedule: Kristin Blackson
 Decision-Making Body: Planning Commission and Board of Supervisors
 Date Schedule Produced/Revised: 8/12/2004

TASK/ACTIVITY	Estimated Duration	Estimated Completion Date	Actual Completion Date
APPLICATION SUBMITTAL			
DPLU reviews for application "completeness", determines project issues, costs and schedule	30	4/23/2004	3/24/2004
DPLU finalizes Environmental Initial Study	14	6/1/2004	5/28/2004
DPLU completes Initial Scoping of EIR	14	6/11/2004	6/15/2004
Applicant submits documents for Public Review of Notice of Preparation (NOP)	7	6/22/2004	6/22/2004
DPLU completes advises and distributes NOP	10	7/1/2004	7/1/2004
Public review of NOP	30	8/2/2004	8/2/2004
DPLU receives and distributes public comments on NOP to Applicant	5	8/9/2004	8/12/2004
DPLU, in consultation with the EIR consultant establishes Thresholds of Significance	10	8/23/2004	
DPLU, in consultation with the EIR consultant establishes Analysis Methodologies	20	9/13/2004	
Board Policy I-119 Review of Thresholds of Significance and Analysis Methodologies	20	10/4/2004	
Applicant submits 1st Draft EIR	180	12/8/2004	
DPLU reviews 1st Draft EIR	45	1/24/2005	
Applicant submits 2nd Draft EIR*	45	3/10/2005	
DPLU reviews 2nd Draft EIR*	30	4/11/2005	
Applicant submits 3rd Draft EIR*	30	5/11/2005	
DPLU reviews 3rd Draft EIR*	21	6/1/2005	
Env. Coordinator reviews Draft EIR	3	6/6/2005	
1st Board Policy I-119 Review of Draft EIR	30	7/6/2005	
DPLU receives and distributes Board Policy I-119 Comments to Applicant	3	7/11/2005	
Applicant submits Revised Draft EIR per Board Policy I-119*	21	8/1/2005	
DPLU reviews revised Draft EIR per Board Policy I-119*	2	8/3/2005	
Env. Coordinator reviews Draft EIR*	3	8/8/2005	
2nd Board Policy I-119 Review of Draft EIR*	30	9/7/2005	
DPLU receives and distributes Board Policy I-119 Comments to Applicant	3	9/12/2005	
Applicant makes final changes to Draft EIR, produces copies of documents, & CDFG Fees	14	9/26/2005	
DPLU completes distribution paperwork, advertises and distributes Draft EIR	10	10/6/2005	
Public Review of Draft EIR	45	11/21/2005	
DPLU transmits Public Comments to Applicant	3	11/24/2005	
DPLU reviews Public Comments	30	12/26/2005	
Applicant submits 1st Draft Responses to Public Comment	14	1/9/2006	
DPLU reviews 1st Draft Responses to Public Comments	13	1/23/2006	
Applicant submits 2nd Draft Responses to Public Comment	14	2/6/2006	
DPLU reviews 2nd Draft Responses to Public Comments	2	2/8/2006	
Env. Coordinator reviews Responses to Public Comments	3	2/13/2006	
Board Policy I-119 Review of Responses to Comments and EIR Changes/Recirculation Decision	20	3/6/2006	
DPLU transmits Board Policy I-119 Comments to Applicant	5	3/13/2006	
Applicant revises EIR, CEQA Findings/Override, and Responses to Public Comment	14	3/27/2006	
DPLU reviews Draft CEQA Findings/Overrides/Recirculation Decision	14	4/10/2006	
DPLU finalizes documentation	10	4/20/2006	
DPLU completes final documents, docketts project and initial PROJECT HEARING/DECISION	72	7/3/2006	

Total Estimated Duration 119 weeks
27.4 months

Bolded tasks are under the control of applicant/consultant.

Italicized tasks are completed concurrently with other tasks.
 *- Task can be eliminated if earlier draft documents are adequate.

Assumptions:

Project will be completed using an Environmental Impact Report.
 The project is considered "sensitive" therefore Board Policy I-119 review will be required.
 Applicant/consultant will provide adequate Environmental Impact Report in three iterations or less.
 Applicant/Consultant will submit all required information in accordance with the estimated schedule/turnaround times.
 The project will not be continued by the decision-making body nor appealed.
 Any Department of Public Works or Department of Environmental Health issues will be resolved concurrently with the environmental process.

The Hearing/Decision date is subject to Decision-Making Body availability and schedule.
 Dates which fall upon a holiday will have an actual completion date the first business day after such holiday.

COMMENTS RECEIVED ON THE NOTICE OF PREPARATION

Appendix A includes a copy of the Notice of Preparation (NOP) and comments received on the NOP from various governmental agencies and interested parties, including federal, state and local government agencies as well as other special interest groups and individuals. The NOP was distributed on July 1, 2004 for a 30-day public review and comment period. Thirteen comment letters were received, including responses noted below, organized by federal, state and local government agencies as well as other special interest groups:

- United States Fish and Wildlife Service and California Department of Fish and Game (joint letter)
- State of California Department of Health Services
- State of California Department of Transportation (Caltrans), District 11
- State of California Governor's Office of Planning and Research—State Clearinghouse
- State of California Native American Heritage Commission
- City of Escondido
- San Diego Association of Governments (SANDAG)
- San Diego Local Agency Formation Commission (LAFCO)
- San Dieguito Planning Group
- Elfin Forest/Harmony Grove Town Council (two letters)
- Escondido Creek Conservancy
- San Diego County Archaeological Society

A public scoping meeting was also held pursuant to Section 21083.9 of CEQA on July 19, 2004 at the Elfin Forest-Harmony Grove Fire Department to obtain comments from the public and/or other interested parties. A number of comment forms were collected at that meeting, as well as subsequent comments via electronic mail (e-mail) and facsimile (fax). These forms, e-mails and faxes are also included in this appendix, in alphabetical order by last name.



U.S. Fish and Wildlife Service
Carlsbad Fish and Wildlife Office
6010 Hidden Valley Road
Carlsbad, California 92009
(760) 431-9440
FAX (760) 431-5902 + 9618



California Department of Fish & Game
South Coast Region
4949 Viewridge Avenue
San Diego, California 92123
(858) 467-4201
FAX (858) 467-4299

In Reply Refer To:
FWS-SDG-4073.1

Mr. Gary L. Pryor
County of San Diego
Department of Planning and Land
5201 Ruffin Road, Suite B
San Diego, California 92123-1666

July 30, 2004

Attn: Kristin Blackson

Re: Notice of Preparation of an Environmental Impact Report for Harmony Grove Village
San Diego County, California (SCH# 2004071004)

Dear Mr. Pryor:

The U.S. Fish and Wildlife Service (Service) and the California Department of Fish and Game (Department), hereafter referred to as the Wildlife Agencies, have reviewed the above-referenced notice of preparation (NOP) of an environmental impact report (EIR) for the Harmony Grove Village project. The Wildlife Agencies have identified potential effects of this project on wildlife and regional conservation planning. The comments provided herein are based on the information provided in the NOP and supporting documentation, the Wildlife Agencies' knowledge of sensitive and declining vegetative communities, our participation in regional conservation planning efforts, and a project meeting on July 9, 2004, attended by the Wildlife Agencies, County of San Diego, the Applicant, and consultants representing the Applicant.

The primary concern and mandate of the Service is the protection of public fish and wildlife resources and their habitats. The Service has legal responsibility for the welfare of migratory birds, anadromous fish, and endangered animals and plants occurring in the United States. The Service is also responsible for administering the Endangered Species Act of 1973, as amended (Act) (16 U.S.C. 1531 *et seq.*). The Department is a Trustee Agency and a Responsible Agency pursuant to the California Environmental Quality Act (CEQA), Sections 15386 and 15381, respectively, and is responsible for the conservation of the State's biological resources, pursuant to the California Endangered Species Act, and California Fish and Game Code. The Department also administers the Natural Community Conservation Planning (NCCP) program.

TAKE PRIDE
IN AMERICA 

Mr. Gary L. Pryor (FWS-SDG-4073.1)

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The proposed project is a mixed-use, rural residential village consisting of residential and commercial uses; open space, park and recreational uses; a sewer package treatment plant; and various equestrian facilities. The 468-acre project site is within the North County Metro Community Planning Area within an unincorporated area of San Diego County, located approximately three miles west of Interstate 15, approximately two miles south of State Route 78, and bound by the City of Escondido on the east and the City of San Marcos to the north-northwest.

The project site supports 14 vegetation communities: freshwater marsh (0.60 acre; FWM); riparian woodland (0.22 acre; RW); southern cottonwood-willow riparian forest (1.93 acres; SCWRF); southern willow scrub (1.80 acres; SWS); mule fat scrub (0.21 acre; MFS); disturbed wetland (2.77 acres); tamarisk scrub (0.17 acre); open water/pond (0.90 acre); native grassland (0.09 acre; NG); coast live oak woodland (18.52 acres; CLOW); Diegan coastal sage scrub (69.69 acres; CSS); coastal sage-chaparral scrub (9.4 acres; CSCS); southern mixed chaparral (9.72 acres; SMC); non-native (annual) grassland (46.15 acres; AG); eucalyptus woodland (3.88 acres); disturbed habitat (66.54 acres); agriculture (214.77 acres); and developed (22.77 acres).

Two sensitive plant species were observed during surveys performed during spring of 2003 and 2004, and late summer 2003: wart-stemmed ceanothus (*Ceanothus verrucosus*; ceanothus) and San Diego sagewort (*Artemisia palmeri*; sagewort). Two coastal California gnatcatcher (*Poliophtila californica californica*; gnatcatcher) individuals were observed during protocol-level surveys conducted during July and December 2003. No least Bell's vireos (*Vireo bellii pusillus*; vireo) were detected during eight surveys conducted June through August 2003. No burrowing owls (*Athene cunicularia*) were detected during the wintering (January and December 2003) and nesting (July 2003) season surveys.

A wetland delineation performed during November and December 2002 according to the wetland delineation guidelines determined that a total of 5.85 acres of U.S. Army Corps of Engineers jurisdictional wetlands occur on the project site: 0.55 acre of FWM, 0.71 acre of SCWRF, 0.54 acre of SWS, 1.35 acres of open water, and 2.04 acres of disturbed wetland. Department jurisdiction includes an additional 8.1 acres of riparian habitats for a total of 13.95 acres of Department jurisdictional areas. These include 0.57 acre of FWS, 1.95 acres of SCWRF, 0.22 acre of RW, 1.81 acres of SWS, 0.01 acre of MFS, 4.23 acres of CLOW, 1.35 acres of open water, and 3.23 acres of disturbed wetland. An additional 0.56 acre of unvegetated streambed occurs on site.

We offer our recommendations and comments in Enclosure 1 to assist the County in minimizing and mitigating project impacts to biological resources, and to assure that the project is consistent with ongoing regional habitat conservation planning efforts. In summary, we have the following comments: 1) the draft EIR should discuss and provide justification for the proposed preserve design; 2) the draft EIR should include an alternative that analyzes a project design with all impacts located east of the north-south drainage in the western portion of the property; 3) the draft EIR should include maps showing proposed wetland buffers, fuel modification zones, and

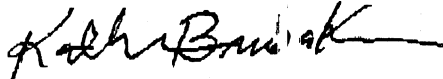
Mr. Gary L. Pryor (FWS-SDG-4073.1)

3

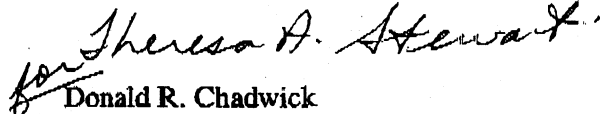
all existing or proposed hiking and/or equestrian trails proposed within open space; 4) impacts to Department jurisdictional wetlands should be mitigated on site through creation and enhancement of habitat along Escondido Creek; 5) the draft EIR should include provisions for temporary and permanent fencing between biological open space and development; 6) all clearing and grubbing should occur outside the bird breeding season (February 15 through August 31); and 7) the EIR should include a provision for a biological monitor to be on site during all clearing and grubbing.

The Wildlife Agency appreciate the opportunity to comment on this NOP. If you have any questions, please contact Janet Stuckrath of the Service at (760) 431-9440, or David Mayer of the Department at (858) 467-4234.

Sincerely,



for Therese O'Rourke
Assistant Field Supervisor
U.S. Fish and Wildlife Service



Donald R. Chadwick
Senior Environmental Scientist
California Department of Fish and Game

Enclosures

cc: State Clearinghouse

ENCLOSURE 1 (FV/S-SDG-4073.1)

1

**WILDLIFE AGENCY
COMMENTS AND RECOMMENDATIONS
ON THE NOTICE OF PREPARATION OF A
DRAFT ENVIRONMENTAL IMPACT REPORT
FOR HARMONY GROVE VILLAGE**

Specific Comments

1. The Biological Technical Report, dated June 17, 2004, proposes to mitigate impacts to 39.91 acres of coastal sage scrub that is occupied by the coastal California gnatcatcher (*Poliophtila californica californica*; gnatcatcher) at a ratio of 1:1. We recommend that the 2:1 ratio be applied to CSS impacts for this project.
2. The property lies along the eastern edge of a potential core area identified in the future preserve for the planning area for the North County segment of the Multiple Species Conservation Program (MSCP). The largest block of undisturbed coastal sage scrub occurs along a north-south trending drainage in the northwestern portion of the property between two agricultural areas. The project as proposed would effectively isolate the drainage and create "edge effects" along the preserve/development interface. Edge effects are defined as undesirable anthropogenic disturbance beyond urban boundaries into potential reserve habitat (Kelly and Rotenberry 1993). Edge effects, such as nonnative predators (pets), exotic ants, trampling, and decreases in avian productivity (Andren and Angelstam 1988) are all documented effects that have negative impacts on sensitive biological resources in Southern California. These edge effects can penetrate up to 200 meters from the actual reserve boundary (CBI 2000). To reduce intrusion into native habitat and minimize edge effects thereby creating a more viable open space preserve design, we recommend that the draft EIR include an alternative with all development located east of the drainage.
3. The project as designed proposes the preservation of disturbed coastal sage scrub within an old quarry on the eastern edge of the property while impacting undisturbed coastal sage scrub on the western portion of the property. The draft Environmental Impact Report (EIR) should discuss how preservation of this habitat will benefit the proposed preserve design for the North County segment of the MSCP.
4. The maps included with the Biological Technical Report do not indicate the location of wetland buffers or fuel modification zones. Fuel modification zones are considered fully impacted and should be included in the impact and mitigation calculations. We recommend that the project include minimum 100-foot buffers from the drip line of wetland vegetation as well as a minimum 100-foot fuel modification zone between open space and the project footprint. The draft EIR should include maps showing the location of all buffers and fuel modification zones.

ENCLOSURE 1 (FWS-SDG-4073.1)

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5. We concur with the proposal in the Biological Technical Report to mitigate impacts to Department jurisdictional wetlands through on site creation and enhancement along Escondido Creek.
6. The potential role of Escondido Creek in facilitating local and regional wildlife movement should be discussed. Post-project corridor widths should be evaluated for the anticipated level of movement and consistent with NCCP planning purposes. Additionally, measures to enhance habitat values within the corridor should be identified and implemented to off-set the proposed substantial increase in human presence following site development.
7. The Biological Technical Report proposes to partially mitigate impacts to annual grassland through the on site preservation of southern mixed chaparral. The draft EIR should provide justification for this proposal from a preserve design standpoint.
8. The breeding season for nesting birds occurs approximately February 15 through August 31; however, raptors may begin breeding as early as January. Because several bird species may nest in the habitat on the project site, we recommend that all clearing and grubbing occur outside the bird breeding season.

If construction will occur (within the cleared portion of the project site but adjacent to habitat on or off site) during the bird breeding season, a qualified biologist should conduct a pre-construction survey of the remaining habitat to determine whether there are active bird nests in the area, including raptors and ground nesting birds. The survey should begin not more than three days prior to the beginning of construction activities. If an active nest is observed, a minimum 300-foot buffer (500 feet for raptors) should be established using temporary fencing. The buffer should be in effect as long as construction is occurring and until the nest is no longer active.

9. Temporary fencing should be required in all locations of the project where proposed grading or clearing is within 100 feet of proposed biological open space. Fencing should be placed on the impact side and should result in no vegetation loss within open space. All temporary fencing shall be removed only after the conclusion of all grading, clearing and construction.
10. We recommend that permanent fencing be installed between the impact area and biological open space. We recommend fencing be designed to minimize intrusion into the sensitive habitats from humans and domestic animals, particularly cats. In addition there should be no gates between the residences and biological open space.
11. We recommend that biological open space occur within lots dedicated to this purpose. "Back yard" open space should be avoided as it has proven difficult to monitor and manage.

ENCLOSURE 1 (FWS-SDG-4073.1)

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12. A complete description and map of the location of any existing or proposed trails in designated open space should be included in the draft EIR. The creation of new trails and use of existing trails in the designated open space will result in direct habitat losses and indirect effects from pets or feral animals, human encroachment, and noise. We recommend that no new trails be created within designated open space unless they replace existing trails that pose greater impacts to the sensitive biological resources. Existing trails near sensitive species may need to be closed during the gnatcatcher breeding season to avoid harassment and nest abandonment. Existing trails should be well-demarcated, have clearly-marked access areas, and have signs discouraging off-trail access and use.
13. The EIR should include the provision for a Wildlife Agency-approved biological monitor to be present during initial clearing, grading, and construction in the vicinity of the preserve to ensure that conservation measures associated with resource agency permits and construction documents are performed. The biological monitor shall have the authority to halt construction to prevent or avoid take of any listed species and/or to ensure compliance with all avoidance, minimization and mitigation measures. Any unauthorized impacts or actions not in compliance with the permits and construction documents should be immediately brought to the attention of the County and the Wildlife Agencies.
14. The Wildlife Agencies recommend the use of native plants to the greatest extent feasible in the landscape areas adjacent to and/or near mitigation/open space areas and/or wetland/riparian areas. The applicant should not plant, seed or otherwise introduce invasive exotic plant species to the landscaped areas adjacent and/or near the mitigation/open space area and/or wetland/riparian areas. Exotic plant species not to be used include those species listed on Lists A & B of the California Exotic Pest Plant Council's list of "Exotic Pest Plants of Greatest Ecological Concern in California as of October 1999." This list includes such species as: pepper trees, pampas grass, fountain grass, ice plant, myoporum, black locust, capeweed, tree of heaven, periwinkle, sweet alyssum, English ivy, French broom, Scotch broom, and Spanish broom. A copy of the complete list can be obtained by contacting the California Exotic Pest Plant Council at 32912 Calle del Tesoro, San Juan Capistrano, California 92675-4427, or by accessing their web site at <http://www.caleppc.org>.

General Comments

To enable Wildlife Agency staff to adequately review and comment on the proposed project from the standpoint of the protection of plants, fish, and wildlife, we recommend the following information be included in the EIR:

1. A complete discussion of the purpose, need for, and description of the proposed project including all staging areas and access routes to the construction and staging areas.
2. A complete list and assessment of the flora and fauna within and next to the project area, with particular emphasis upon identifying State or federally listed rare, threatened,

ENCLOSURE 1 (FV/S-SDG-4073.1)

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endangered, or proposed candidate species, California Species-of-Special Concern and/or State Protected or Fully Protected species, and any locally unique species and sensitive habitats. Specifically, the EIR should include:

- a. A thorough assessment of Rare Natural Communities on site and within the area of impact, following the Department's Guidelines for Assessing Impacts to Rare Plants and Rare Natural Communities.
 - b. A current inventory of the biological resources associated with each habitat type on site and within the area of impact. The Department's California Natural Diversity Data Base in Sacramento should be contacted at (916) 327-5960 to obtain current information on any previously reported sensitive species and habitats, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code.
 - c. Discussions regarding seasonal variations in use by sensitive species of the project site and area of impact on those species, and acceptable species-specific survey procedures as determined through consultation with the Wildlife Agencies. Focused species-specific surveys, conducted in conformance with established protocols at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required.
3. A thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources. All facets of the project should be included in this assessment. Specifically, the EIR should provide:
- a. Specific acreage and descriptions of the types of wetlands, coastal sage scrub and other habitats that will or may be affected by the proposed project or project alternatives should be included. Maps and tables should be used to summarize such information.
 - b. Discussions regarding the regional setting, pursuant to the California Environmental Quality Act (CEQA) Guidelines, Section 15125(a), with special emphasis on resources that are rare or unique to the region that would be affected by the project. This discussion is critical to an assessment of environmental impacts.
 - c. Detailed discussions, including both qualitative and quantitative analyses, of the potentially affected listed and sensitive species (fish, wildlife, plants), and their habitats on the proposed project site, area of impact, and alternative sites, including information pertaining to their local status and distribution. The anticipated or real impacts of the project on these species and habitats should be fully addressed.

ENCLOSURE 1 (FVS-SDG-4073.1)

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- d. Discussions regarding indirect project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed Natural Community Conservation Planning program (NCCP) reserve lands. Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated and provided. A discussion of potential adverse impacts from lighting, noise, human activity, exotic species, and drainage. The latter subject should address: project-related changes on drainage patterns on and downstream of the project site; the volume, velocity, and frequency of existing and post-project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-project fate of runoff from the project site.
 - e. Discussions regarding possible conflicts resulting from wildlife-human interactions at the interface between the development project and natural habitats. The zoning of areas for development projects or other uses that are nearby or adjacent to natural areas may inadvertently contribute to wildlife-human interactions.
 - f. An analysis of cumulative effects, as described under CEQA Guidelines, Section 15130. General and specific plans, and past, present, and anticipated future projects, should be analyzed concerning their impacts on similar plant communities and wildlife habitats.
 - g. If applicable, an analysis of the effect that the project may have on completion and implementation of regional and/or subregional conservation programs. Under § 2800 - § 2840 of the Fish and Game Code, the Department, through the NCCP program, is coordinating with local jurisdictions, landowners, and the Federal Government to preserve local and regional biological diversity. Coastal sage scrub is the first natural community to be planned for under the NCCP program. The Department recommends that the City ensure that the development of this project does not preclude long-term preserve planning options, and that this project conforms with other requirements of the NCCP program. Jurisdictions participating in the NCCP program should assess specific projects for consistency with the NCCP Conservation Guidelines. Additionally, the jurisdictions should quantify and qualify: 1) the amount of coastal sage scrub within their boundaries; 2) the acreage of coastal sage scrub habitat removed by individual projects; and 3) any acreage set aside for mitigation. This information should be kept in an updated ledger system.
4. A thorough discussion of mitigation measures for adverse project-related impacts on sensitive plants, animals, and habitats. These should be measures to fully avoid and otherwise protect Rare Natural Communities from project-related impacts. The Wildlife

ENCLOSURE 1 (FWS-SDG-4073.1)

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Agencies consider these communities as threatened habitats having both regional and local significance.

Mitigation measures should emphasize avoidance, and where avoidance is infeasible, reduction of project impacts. The Wildlife Agencies generally do not support the use of relocation, salvage, and/or transplantation as mitigation for impacts on rare, threatened, or endangered species. Studies have shown that these efforts are experimental in nature and largely unsuccessful.

This discussion should include measures to perpetually protect the targeted habitat values where preservation and/or restoration is proposed. The objective should be to offset the project-induced qualitative and quantitative losses of wildlife habitat values. Issues that should be addressed include restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc. Plans for restoration and revegetation should be prepared by persons with expertise in southern California ecosystems and native plant revegetation techniques. Each plan should include, at a minimum: (a) the location of the mitigation site; (b) the plant species to be used; (c) a schematic depicting the mitigation area; (d) time of year that planting will occur; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; (j) identification of the entity(ies) that will guarantee achieving the success criteria and provide for conservation of the mitigation site in perpetuity.

Mitigation measures to alleviate indirect project impacts on biological resources must be included, including measures to minimize changes in the hydrologic regimes on site, and means to convey runoff without damaging biological resources, including the morphology of onsite and downstream habitats.

5. Descriptions and analyses of a range of alternatives to ensure that alternatives to the proposed project are fully considered and evaluated. The analyses must include alternatives that avoid or otherwise reduce impacts to sensitive biological resources. Specific alternative locations should be evaluated in areas of lower resource sensitivity where appropriate.
6. The Wildlife Agencies have responsibility for the conservation of wetland and riparian habitats. It is the policy of the Wildlife Agencies to strongly discourage development or conversion of wetlands. We oppose any development or conversion which would result in a reduction of wetland acreage or wetland habitat values, unless, at a minimum, project mitigation assures there will be "no net loss" of either wetland habitat values or acreage. Development and conversion include but are not limited to conversion to subsurface drains, placement of fill or building of structures within the wetland, and channelization or removal of materials from the streambed. All wetlands and

ENCLOSURE 1 (FWS-SDG-4073.1)

7

watercourses, whether intermittent or perennial, should be retained and provided with substantial setbacks which preserve the riparian and aquatic values and maintain their value to on-site and off-site wildlife populations.

If appropriate, a jurisdictional delineation of lakes, streams, and associated riparian habitats should be included in the EIR, including a wetland delineation pursuant to the U.S. Fish and Wildlife Service definition (Cowardin 1979) adopted by the Department. Please note that wetland and riparian habitats subject to the Department's authority may extend beyond the jurisdictional limits of the U.S. Army Corps of Engineers.

The proposed project may require a Lake or Streambed Alteration Agreement (SAA). The Department has direct authority under Fish and Game Code section 1600 *et. seq.* regarding any proposed activity that would divert, obstruct, or affect the natural flow or change the bed, channel, or bank of any river, stream, or lake. The Department's issuance of a SAA for a project that is subject to CEQA requires CEQA compliance actions by the Department as a Responsible Agency. As a Responsible Agency under CEQA, the Department may consider the City's (Lead Agency's) CEQA documentation. To minimize additional requirements by the Department pursuant to Section 1600 *et seq.* and/or under CEQA, the documentation should fully identify the potential impacts to the lake, stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the agreement. A SAA notification form may be obtained by writing to the Department of Fish and Game, 4949 Viewridge Avenue, San Diego, California 92123-1662, or by calling (858) 636-3160, or by accessing the Department's web site at www.dfg.ca.gov/1600. The Department's SAA Program holds regularly scheduled pre-project planning/early consultation meetings. To make an appointment, please call the Department at (858) 636-3160.

Literature Cited

- Conservation Biology Institute. 2000. Public Review Draft MHCP Plan Volume 1
- Cowardin, Lewis M., V. Carter, G. C. Golet, and E. T. LaRoe. 1979. Classification of wetlands and deepwater habitats of the United States. Fish and Wildlife Service, U.S. Department of the Interior. U. S. Government Printing Office, Washington, D.C.
- Andren, H. and P. Angelstam. 1988. Elevated predation rates as an edge effect in habitat islands: experimental evidence. *Ecology* 64: 1057-1068.
- Kelly, P. A. and J. T. Fotenberry. Buffer zones for ecological reserves in California. In J. E. Keeley, ed. *Interface Between Ecology and Land Development in California*. Southern California Academy of Sciences, Los Angeles.

State of California—Health and Human Services Agency
Department of Health Services



California
Department of
Health Services

SANDRA SHEWRY
Director



ARNOLD SCHWARZENEGGER
Governor

July 13, 2004

RECEIVED
JUL 20 2004

DEPT. OF PLANNING & LAND USE

Kristin Blackson
San Diego County Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123

HARMONY GROVE VILLAGE (STATE CLEARING HOUSE # 2004071004)

Our office received the Notice of Preparation for the proposed project referred to as Harmony Grove Village.

The Department requests that the water agencies supplying this proposed development demonstrate that they have an adequate source of water. Demonstration of the adequacy of water supply should be determined prior to the approval of new parcel maps for this development and construction of additional water supply/treatment facilities needed to supply this increased water demand. The demonstration of water supply adequacy should also include a summary of the water agencies water rights and contracts that ensure that existing customers and newly approved customer water demands will be reliably supplied.

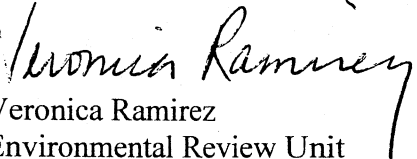
In accordance with Section 1164550 of the Health and Safety Code, any modifications to the water agencies existing system that adds sources of supply, treatment and/or significantly alter their existing distribution system will require a water supply permit from our office as presented in the code section below:

Section 116550. Changes requiring amended permit

- (a) No person operating a public water system shall modify, add to or change his or her source of supply or method of treatment of, or change his or her distribution system as authorized by a valid existing permit issued to him or her by the department unless the person first submits an application to the department and receives an amended permit as provided in this chapter authorizing the modification, addition or change in his or her source of supply or method of treatment.

We appreciate the opportunity to comment on this Notice of Preparation. If you have any questions, please contact the San Diego District office at (619) 525-4159.

Sincerely,


Veronica Ramirez
Environmental Review Unit
California Department of Health Services

CC: State Clearinghouse – Office of Planning and Research

DEPARTMENT OF TRANSPORTATION

DISTRICT 11

P. O. BOX 85406, MS 50
SAN DIEGO, CA 92186-5406
PHONE (619) 688-6954
FAX (619) 688-4299
TTY (619) 688-6670



*Flex your power!
Be energy efficient!*

July 30, 2004

11-SD-78
PM 15.5 (KP 24.9)
SCH 2004071004

Ms. Kristin Blackson
County of San Diego
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123-1666

Dear Ms. Blackson:

The California Department of Transportation (Department) has received the Notice of Preparation for **Harmony Grove Village**, a proposed 696-unit planned development south of State Routes 78 (SR 78) and west of Interstate 15 (I-15). We have the following comments:

- This project could generate a major amount of additional traffic to the state-owned facilities, SR 78 and I-15. In order to facilitate our assessment of the project, the project proponent should prepare a traffic impact study in accordance with Caltrans Guide for the Preparation of Traffic Impact Studies (TIS Guide), dated December 2002. Minimum contents of the traffic impact study are listed in Appendix "A" of the TIS guide.
- Analyze all State-owned signalized intersections affected by this project, using the intersecting lane vehicle (ILV) procedure from Caltrans Highway Design Manual Topic 406, page 400-21. The affected intersections would include, at a minimum, the SR 78 / Nordahl Road interchange and the I-15 / Valley Parkway interchange.
- The level of service (LOS) for operating State highway facilities is based upon measures of effectiveness (MOE) (see Appendix "C-2" of the TIS guide). The Department endeavors to maintain a target level of service (LOS) at the transition between LOS "C" and LOS "D" (see Appendix "C-3" of the TIS guide). If an existing State highway facility is operating at less than this target LOS, the existing MOE should be maintained.
- The Department supports the concept of "Fair Share Contributions" on the part of the developers due to traffic impacts by the proposed development. Therefore, it is our recommendation that the developer contribute their fair share for improvements to SR 78 and I-15 based on the finding of the Traffic Study.

Ms. Kristin Blackson
July 12, 2004
Page 2

Close coordination with the Department is encouraged. If you have any questions, please contact Vann Hurst, Development Review Branch, at 619-688-6976.

Sincerely,



FOR MARIO H. ORSO, Chief
Development Review Branch

C: BFigge (MS 50)
EGojuangco (MS 55)
VHurst (MS 50)
LSHick, SDCounty DPW
Harmony Grove Village



Arnold
Schwarzenegger
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Jan Boel
Acting Director

Notice of Preparation

RECEIVED

JUL 09 2004

San Diego County
DEPT. OF PLANNING & LAND USE

July 1, 2004

To: Reviewing Agencies

Re: Harmony Grove Village; LOG No. 04-08-011; SP 04-03; GPA 04-04; REZ 04-010; TM 5365; P04-012;
P04-013; P04-014
SCH# 2004071004

Attached for your review and comment is the Notice of Preparation (NOP) for the Harmony Grove Village; LOG No. 04-08-011; SP 04-03; GPA 04-04; REZ 04-010; TM 5365; P04-012; P04-013; P04-014 draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.


Please direct your comments to:

Kristin Blackson
San Diego County Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123-1666

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,


Scott Morgan
Associate Planner, State Clearinghouse

Attachments
cc: Lead Agency

**Document Details Report
State Clearinghouse Data Base**

SCH# 2004071004
Project Title Harmony Grove Village; LOG No. 04-08-011; SP 04-03; GPA 04-04; REZ 04-010; TM 5365; P04-012;
Lead Agency P04-013; P04-014
San Diego County Department of Planning and Land Use

Type NOP Notice of Preparation
Description Mixed-use, rural residential village consisting of residential uses, commercial uses, open space and park and recreational uses, a sewer package treatment plant and various equestrian facilities including an equestrian ranch for horse boarding and lessons. The project application includes a Specific Plan, a Vesting Tentative Map and three Major Use Permits (MUPs). One MUP is being proposed for the Private Equestrian Ranch (PER), one MUP is proposed for the Wastewater Treatment Facility, and the third MUP is proposed for the remainder of the project site (e.g., residential, commercial, recreation).

Lead Agency Contact

Name Kristin Blackson
Agency San Diego County Department of Planning and Land Use
Phone 858-694-3012
email
Address 5201 Ruffin Road, Suite B
City San Diego
State CA **Zip** 92123-1666
Fax

Project Location

County San Diego
City San Diego
Region
Cross Streets Harmony Grove Road and Country Club Road
Parcel No. several
Township 12S
Range 2W
Section 30
Base SBB&M

Proximity to:

Highways I-15, SR-78
Airports
Railways
Waterways
Schools
Land Use

Land Use Designation: (17) Estate Residential, (18) Multiple Rural Use, (19) Intensive Agriculture, (24) Impact Sensitive Area, (24) Impact Sensitive/Extractive

Plain/Flooding; Geologic/Seismic; Minerals; Noise; Public Services; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife; Growth Inducing; Landuse; Cumulative Effects

Reviewing Agencies Resources Agency; Department of Conservation; Department of Parks and Recreation; Department of Water Resources; Department of Fish and Game, Region 5; Department of Health Services; Native American Heritage Commission; California Highway Patrol; Caltrans, District 11; State Water Resources Control Board, Division of Water Quality; Regional Water Quality Control Board, Region 9

Date Received 07/01/2004
Start of Review 07/01/2004
End of Review 07/30/2004

Note: Blanks in data fields result from insufficient information provided by lead agency.

NOP Distribution List

County: San Diego

SCH#

8004411004

<input checked="" type="checkbox"/> <u>Resources Agency</u> Nadell Gayou	<input type="checkbox"/> <u>Dept. of Fish & Game</u> Robert Floerke Region 3	<input type="checkbox"/> <u>Public Utilities Commission</u> Ken Lewis	<input type="checkbox"/> <u>Dept. of Transportation 8</u> John Pagano District 8	<input type="checkbox"/> <u>Regional Water Quality Control Board (RWQCB)</u>
<input checked="" type="checkbox"/> <u>Resources Agency</u> Nadell Gayou	<input type="checkbox"/> <u>Dept. of Fish & Game</u> William Laudermilk Region 4	<input type="checkbox"/> <u>State Lands Commission</u> Jean Sarino	<input type="checkbox"/> <u>Dept. of Transportation 9</u> Gayle Rosander District 9	<input type="checkbox"/> <u>RWQCB 1</u> Cathleen Hudson North Coast Region (1)
<input type="checkbox"/> <u>Dept. of Boating & Waterways</u> Suzi Betzler	<input checked="" type="checkbox"/> <u>Dept. of Fish & Game</u> Don Chadwick Region 5, Habitat Program	<input type="checkbox"/> <u>Tahoe Regional Planning Agency (TRPA)</u> Cherry Jacques	<input type="checkbox"/> <u>Dept. of Transportation 10</u> Tom Dumas District 10	<input type="checkbox"/> <u>RWQCB 2</u> Environmental Document Coordinator San Francisco Bay Region (2)
<input type="checkbox"/> <u>California Coastal Commission</u> Elizabeth A. Fuchs	<input type="checkbox"/> <u>Dept. of Fish & Game</u> Gabrina Gatchel Region 6, Habitat Program	<input type="checkbox"/> <u>Business, Trans & Housing</u>	<input checked="" type="checkbox"/> <u>Dept. of Transportation 11</u> Mario Orso District 11	<input type="checkbox"/> <u>RWQCB 3</u> Central Coast Region (3)
<input type="checkbox"/> <u>Colorado River Board</u> Gerald R. Zimmerman	<input type="checkbox"/> <u>Dept. of Fish & Game</u> Tammy Allen Region 6, Inyo/Mojave Conservation Program	<input type="checkbox"/> <u>Caltrans - Division of Aeronautics</u> Sandy Hesnard	<input type="checkbox"/> <u>Dept. of Transportation 12</u> Bob Joseph District 12	<input type="checkbox"/> <u>RWQCB 4</u> Jonathan Bishop Los Angeles Region (4)
<input type="checkbox"/> <u>Dept. of Conservation</u> Roseanne Taylor	<input type="checkbox"/> <u>Dept. of Fish & Game</u> George Isaac Marine Region	<input type="checkbox"/> <u>Caltrans - Planning</u> Terri Pencovic	<input type="checkbox"/> <u>Cal EPA</u>	<input type="checkbox"/> <u>RWQCB 5S</u> Central Valley Region (5)
<input type="checkbox"/> <u>California Energy Commission</u> Environmental Office	<input type="checkbox"/> <u>Other Departments</u>	<input type="checkbox"/> <u>California Highway Patrol</u> John Olejnik Office of Special Projects	<input type="checkbox"/> <u>Air Resources Board</u>	<input type="checkbox"/> <u>RWQCB 5F</u> Central Valley Region (5) Fresno Branch Office
<input type="checkbox"/> <u>Dept. of Forestry & Fire Protection</u> Allen Robertson	<input type="checkbox"/> <u>Food & Agriculture</u> Steve Shafer Dept. of Food and Agriculture	<input type="checkbox"/> <u>Housing & Community Development</u> Cathy Creswell Housing Policy Division	<input type="checkbox"/> <u>Airport Projects</u> Jim Lerner	<input type="checkbox"/> <u>RWQCB 5R</u> Central Valley Region (5) Redding Branch Office
<input type="checkbox"/> <u>Office of Historic Preservation</u> Hans Kreutzberg	<input type="checkbox"/> <u>Dept. of General Services</u> Robert Sleppey Environmental Services	<input type="checkbox"/> <u>Dept. of Transportation</u>	<input type="checkbox"/> <u>Transportation Projects</u> Kurt Karperos	<input type="checkbox"/> <u>RWQCB 6</u> Lahontan Region (6)
<input type="checkbox"/> <u>Dept. of Parks & Recreation</u> B. Noah Tighman Environmental Stewardship Section	<input type="checkbox"/> <u>Dept. of Health Services</u> Wayne Hubbard Dept. of Health/Disease Prevention	<input type="checkbox"/> <u>Dept. of Transportation 1</u> Mike Eagan District 1	<input type="checkbox"/> <u>Industrial Projects</u> Mike Tollstrup	<input type="checkbox"/> <u>RWQCB 6V</u> Lahontan Region (6) Victorville Branch Office
<input type="checkbox"/> <u>Reclamation Board</u> DeeDee Jones	<input checked="" type="checkbox"/> <u>Independent Commissions, Boards</u>	<input type="checkbox"/> <u>Dept. of Transportation 2</u> Don Anderson District 2	<input type="checkbox"/> <u>California Integrated Waste Management Board</u> Sue O'Leary	<input type="checkbox"/> <u>RWQCB 7</u> Colorado River Basin Region (7)
<input type="checkbox"/> <u>Santa Monica Mountains Conservancy</u> Paul Edelman	<input type="checkbox"/> <u>Delta Protection</u> Debbie Eddy	<input type="checkbox"/> <u>Dept. of Transportation 3</u> Jeff Pulverman District 3	<input type="checkbox"/> <u>State Water Resources Control Board</u> Jim Hockenberry Division of Financial Assistance	<input type="checkbox"/> <u>RWQCB 8</u> Santa Ana Region (8)
<input type="checkbox"/> <u>S.F. Bay Conservation & Development Comm.</u> Steve McAdam	<input type="checkbox"/> <u>Office of Emergency Services</u> John Rowden, Major	<input type="checkbox"/> <u>Dept. of Transportation 4</u> Tim Sable District 4	<input type="checkbox"/> <u>State Water Resources Control Board</u> Student Intern, 401 Water Quality Certification Unit Division of Water Quality	<input checked="" type="checkbox"/> <u>RWQCB 9</u> San Diego Region (9)
<input checked="" type="checkbox"/> <u>Dept. of Water Resources</u> Resources Agency Nadell Gayou	<input type="checkbox"/> <u>Governor's Office of Planning & Research</u> State Clearinghouse	<input type="checkbox"/> <u>Dept. of Transportation 5</u> David Murray District 5	<input type="checkbox"/> <u>State Water Resources Control Board</u> Steven Herrera Division of Water Rights	<input type="checkbox"/> <u>Other</u>
<input type="checkbox"/> <u>Fish and Game</u>	<input type="checkbox"/> <u>Native American Commission</u> Debbie Treadway	<input type="checkbox"/> <u>Dept. of Transportation 6</u> Marc Bimbaum District 6	<input type="checkbox"/> <u>Dept. of Toxic Substances Control</u> CEQA Tracking Center	
<input type="checkbox"/> <u>Dept. of Fish & Game</u> Scott Flint Environmental Services Division		<input type="checkbox"/> <u>Dept. of Transportation 7</u> Cheryl J. Powell District 7		
<input type="checkbox"/> <u>Dept. of Fish & Game</u> Donald Koch Region 1				
<input type="checkbox"/> <u>Dept. of Fish & Game</u> Banky Curtis Region 2				

Last Updated on 05/21/04

NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364
SACRAMENTO, CA 95814
(916) 653-4082
(916) 657-5390 – Fax



July 9, 2004

RECEIVED

JUL 13 2004

San Diego County
DEPT. OF PLANNING & LAND USE

Ms. Kristin Blackson
San Diego County DPLU
5201 Ruffin Road, Suite B
San Diego, CA 92123-1666

Re: DEIR for Harmony Grove Village
SCH# 2004071004

Dear Ms. Blackson:

Thank you for the opportunity to comment on the above-mentioned document, and for your assistance in ensuring that we had the opportunity to review the archaeological surveys for this project. The Commission was able to perform a record search of its Sacred Lands File for the project area, which failed to indicate the presence of Native American cultural resources in the immediate project area. The absence of specific site information in the Sacred Lands File does not indicate the absence of cultural resources in any project area. Other sources of cultural resources should also be contacted for information regarding known and recorded sites.

Early consultation with tribes in your area is the best way to avoid unanticipated discoveries once a project is underway. Enclosed is a list of Native Americans individuals/organizations that may have knowledge of cultural resources in the project area. The Commission makes no recommendation of a single individual or group over another. Please contact all those listed; if they cannot supply you with specific information, they may be able to recommend others with specific knowledge. By contacting all those listed, your organization will be better able to respond to claims of failure to consult with the appropriate tribe or group. If you have not received a response within two weeks' time, we recommend that you follow-up with a telephone call to make sure that the information was received.

Lack of surface evidence of archeological resources does not preclude the existence of archeological resources. Lead agencies should include provisions for accidentally discovered archeological resources during construction per California Environmental Quality Act (CEQA), Public Resources Code §15064.5 (f); Health and Safety Code §7050.5; and Public Resources Code §5097.98 mandate the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery and should be included in all environmental documents. If you have any questions, please contact me at (916) 653-6251.

Sincerely,

A handwritten signature in cursive script, reading "Carol Gaubatz".

Carol Gaubatz
Program Analyst

Cc: State Clearinghouse

NATIVE AMERICAN CONTACTS
San Diego County
July 9, 2004

Barona Group of the Capitan Grande
Clifford LaChappa, Chairperson
1095 Barona Road Diegueno
Lakeside, CA 92040
(619) 443-6612

Ewiiapaayp Tribal Office
Harlan Pinto, Chairperson
PO Box 2250 Kumeyaay
Alpine, CA 91903-2250
wmicklin@leaningrock.net
(619) 445-6315 - voice
(619) 445-9126 - fax

Barona Group of the Capitan Grande
Lucille Richard, EPA Specialist
1095 Barona Road Diegueno
Lakeside, CA 92040
(619) 443-6612

Ewiiapaayp Tribal Office
James Robertson, Cultural Resources Coordinator
PO Box 2250 Kumeyaay
Alpine, CA 91903-2250
jrobertson@leaningrock.net
(619) 445-6315 - voice
(619) 445-9126 - fax

Barona Group of the Capitan Grande
Steve Banegas, Cultural Resources Coordinator
1095 Barona Road Diegueno
Lakeside, CA 92040
(619) 443-6612

Ewiiapaayp Tribal Office
Michael Garcia, Environmental Coordinator
PO Box 2250 Kumeyaay
Alpine, CA 91903-2250
michaelg@leaningrock.net
(619) 445-6315 - voice
(619) 445-9126 - fax

Barona Group of the Capitan Grande
Sue Thomas, Tribal Administrator
1095 Barona Road Diegueno
Lakeside, CA 92040
(619) 443-6612

Ewiiapaayp Tribal Office
Will Micklin, Tribal Administrator
PO Box 2250 Kumeyaay
Alpine, CA 91903-2250
wmicklin@leaningrock.net
(619) 445-6315 - voice
(619) 445-9126 - fax

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed Harmony Grove Village EIR, SCH# 2004071004, San Diego County.

NATIVE AMERICAN CONTACTS
San Diego County
July 9, 2004

naja Band of Mission Indians
Rebecca Osuna
1040 East Parkway, Suite A Diegueno
Escondido, CA 92025
(760) 747-8581
(760) 747-8568 Fax

Mesa Grande Band of Mission Indians
Howard Maxcy, Chairperson
P.O Box 270 Diegueno
Santa Ysabel, CA 92070
(760) 782-3818
(760) 782-9092 Fax

Kumeyaay Cultural Historic Committee
Ron Christman
36 Viejas Grade Road Diegueno/Kumeyaay
Alpine, CA 92001
(619) 445-0385

Pala Band of Mission Indians
Robert Smith, Chairperson
P.O. Box 50 Luiseno
Pala, CA 92059 Cupeno
(760) 742-3784
(760) 742-1411 Fax

Kumeyaay Cultural Repatriation Committee
Steve Banegas, Spokesperson
1095 Barona Road Diegueno/Kumeyaay
Lakeside, CA 92040
(619) 443-6612
(619) 443-0681 FAX

Pauma & Yuima
Bennae Calac, Cultural Resource Coordinator
P.O. Box 369 Luiseno
Pauma Valley, CA 92061
(760) 742-1289
(760) 742-3422 Fax

La Jolla Band of Mission Indians
Wendy Schlater, Chairperson
22000 Highway 76 Luiseno
Pauma Valley, CA 92061
(760) 742-3771/72
(760) 742-1701 Fax

Pauma & Yuima
Christobal C. Devers, Chairperson
P.O. Box 369 Luiseno
Pauma Valley, CA 92061
(760) 742-1289
(760) 742-3422 Fax

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed Harmony Grove Village EIR, SCH# 2004071004, San Diego County.

NATIVE AMERICAN CONTACTS
San Diego County
July 9, 2004

Pauma & Yuima
Juanita Dixon, Environmental Coordinator
P.O. Box 369 Luiseno
Pauma Valley , CA 92061
(760) 742-1289
(760) 742-3422 Fax

Rincon Band of Mission Indians
John Currier, Tribal Chairperson
P.O. Box 68 Luiseno
Valley Center , CA 92082
(760) 749-1051
(760) 749-8901 Fax

Pauma & Yuima
Valerie Linton, Tribal Administrator
P.O. Box 369 Luiseno
Pauma Valley , CA 92061
(760) 742-1289
(760) 742-3422 Fax

Rincon Band of Mission Indians
Kristie Orosco, Environmental Coordinator
P.O. Box 68 Luiseno
Valley Center , CA 92082
(760) 749-1051
(760) 749-8901 Fax

Pechanga Band of Mission Indians
Mark Macarro, Chairperson
P.O. Box 1477 Luiseno
Temecula , CA 92593
(909) 676-2768
(909) 695-1778 Fax

Rincon Band of Mission Indians
Rob Shaffer, Tribal Administrator
P.O. Box 68 Luiseno
Valley Center , CA 92082
(760) 749-1051
(760) 749-8901 Fax

Rincon Band of Mission Indians
Culture Committee
P.O. Box 68 Luiseno
Valley Center , CA 92082
(760) 749-1051
(760) 749-8901 Fax

San Luis Rey Band of Mission Indians
Carmen Mojado, Co-Chair
1889 Sunset Drive Luiseno
Vista , CA 92081

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed Harmony Grove Village EIR, SCH# 2004071004, San Diego County.

NATIVE AMERICAN CONTACTS
San Diego County
July 9, 2004

San Luis Rey Band of Mission Indians
Henry Contreras, Most Likely Descendent
763 Chapulin Lane Luiseno
Fallbrook, CA 92028 Cupeno
(760) 728-6722 - Home
(760) 207-3618 - Cell

Soboba Band of Mission Indians
Robert J. Salgado, Sr., Chairperson
P.O. Box 487 Luiseno
San Jacinto, CA 92581
(909) 654-2765
Fax: (909) 654-4198

San Luis Rey Band of Mission Indians
Mark Mojado, Cultural Resources
P.O. Box 1 Luiseno
Pala, CA 92059
(760) 742-4468
(760) 586-4858 (cell)

Sycuan Band of Mission Indians
Danny Tucker, Chairperson
5459 Dehesa Road Diegueno/Kumeyaay
El Cajon, CA 92021
619 445-2613
619 445-1927 Fax

San Luis Rey Band of Mission Indians
Russell Romo, Chairperson
12064 Old Pomerado Rd. Luiseno
Poway, CA 92064 Cupeno
(858) 748-1586

Viejas Band of Mission Indians
Anthony Pico, Chairperson
PO Box 908 Diegueno/Kumeyaay
Alpine, CA 91903
(619) 445-3810
(619) 445-5337 Fax

San Pasqual Band of Mission Indians
Allen E. Lawson, Chairperson
PO Box 365 Diegueno
Valley Center, CA 92082
(760) 749-3200
(760) 749-3876 Fax

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed Harmony Grove Village EIR, SCH# 2004071004, San Diego County.

CITY OF ESCONDIDO

Community Development Department

FAX TRANSMISSION COVER SHEET

Date: 8/2/04 Fax #: (858) 694 3373

To: Kristen Blackson

From: Jan Petrick

Phone: (760) 839-4556

Project/Subject: Harmony Grove NOP

Comments: _____

Total pages, including Transmittal Form: ⑤



City of Escondido
201 North Broadway
Escondido, CA 92025-2798
Fax (760) 839-4313



Charles D. Grimm
Director of Community Development
Planning Division
201 North Broadway, Escondido, CA 92025
Phone: 760-839-4671 Fax: 760-839-4313

August 2, 2004

Gary L. Pryor
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123-1666

RE: Notice of Preparation of Environmental Impact Report for Harmony Grove Village
(SP 04-03, GPA 04-04, R04-010, TM 5365, P04-012, P04-013, P04-014, Log No. 04-08-011)

Dear Mr. Pryor:

We appreciate the opportunity to review the Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the proposed Harmony Grove Village Project and are submitting the following comments. Our comments focus primarily on the need to study land use, traffic, sewage disposal, water supply and fire protection and associated public facility and service improvements, as described below.

The City of Escondido concurs with the requirement to prepare an EIR for the proposed project. Due to proposed circulation plan and the anticipated offsite circulation improvements which may be required as mitigation, we anticipate that the City of Escondido will be a Responsible Agency under CEQA Section 15381 and should be identified as such in the EIR. We further request that the EIR Project Description text be revised to more completely reflect all components of the application, specifically the proposed amendments to the County's General Plan Land Use and Circulation Elements with detailed description and exhibits depicting the design width and location of offsite improvements.

The Harmony Grove Village project proposes a substantial density increase compared to the existing general plan of both the County of San Diego and the City of Escondido. Even though the area is not located within the City of Escondido Sphere of Influence it is within the City's General Plan area, the EIR should include an analysis of the project's compliance with the City's General Plan policies. The project site is designated as Rural I and Rural II, which allows low-density residential development with a maximum one unit per two acres and one unit per four acres respectively. The EIR land use section should analyze differences between the density, land use distribution and development pattern anticipated in City's General Plan Land Use Element with the proposed land use plan. Additionally, ongoing efforts by the Escondido Union High School District to locate alternative sites for construction a new high school facility to serve prospective residents should also be included in the analysis.

Gary Pryor
August 2, 2004
Page 2

With respect to traffic, the project proposes to downgrade County Circulation Element streets and doesn't address the necessity of improving/constructing existing or proposed Circulation Element streets due to the apparent density increases. Rather than evaluate the construction of the County's SC 1375 connection to Del Dios Highway, the project appears to be designed to redirect traffic east and northward through the City of Escondido via Avenida Del Diablo and Country Club Drive. As previously requested in our June 3, 2003, and June 15, 2004, letters commenting on the County's proposed General Plan 2020 update, we continue to request that the EIR examine the impacts of redirecting traffic through Escondido. Recognizing that existing streets in this area of the City are currently congested (current levels of service are available from the City of Escondido Engineering Department) the EIR would also need to determine the appropriate mitigation.

The EIR must also assess other anticipated off-site traffic improvements. The status of SC 1375 is unclear and needs to be clarified in the circulation plan for the Harmony Grove Village Project. If this Circulation Element Street is not proposed for construction it should be noted in the project description and there should be an equal treatment of alternatives analyzing options to mitigate the impacts of directing traffic through Escondido. One such option should include construction of the Citracado Parkway Bridge over Escondido Creek as designated in the City's Circulation Element.

The Harmony Grove Village Project traffic evaluation should include analysis in accordance with Escondido's Quality of Life Standards that determines any project adding 200 or more trips to a Circulation Element Street with a service level below mid-range of LOS "D" yet above LOS "F" as constituting a significant impact. Traffic analysis should also be performed in accordance with SANTEC guidelines involving the following intersections and street segments for analysis:

1. The project description should include construction of the Harmony Grove Road realignment to intersect Citracado Parkway in accordance with the Escondido Research Technology Center (ERTC) Specific Alignment Plan for Citracado Parkway, intersection of Harmony Grove Rd / Kauana Loa Rd, and extension of Citracado Parkway between Harmony Grove Road and Andreasen Drive.
2. The project traffic study should include analysis of roadway segments and intersections for the following corridors:
 - a) Country Club Drive between Harmony Grove Road and Citracado Parkway.
 - b) Citracado Parkway between Harmony Grove Road, through the ERTC project, to SR78 east and west bound ramps. Specific intersections to analyze along this corridor include:
 - the future intersection of Citracado Parkway and Vineyard Avenue,
 - the intersection of Citracado Parkway and Country Club Drive,
 - the intersection of Nordahl Road and Mission Avenue.
 - c) Andreasen Drive between Citracado Parkway and Auto Parkway.
 - d) Harmony Grove Road between Enterprise Street and Hale Avenue, if the roadway is subject to more than 50 peak hour trips from the project.
 - e) Auto Parkway between Andreasen Drive and West Valley Parkway.
 - f) Avenida Del Diablo between project and West Valley Parkway
 - g) Citracado Parkway between Avenida del Diablo and West Valley Parkway.
 - h) West Valley Parkway between Via Rancho Parkway and the I-15 north and south bound ramps.
 - i) Via Rancho Parkway between Del Dios Hwy and I-15 north and south bound ramps.

Gary Pryor
August 2, 2004
Page 3

3. Based on the City's experience with analyzing traffic impacts of the adjacent Escondido Research and Technology, the City recommends that the EIR traffic study evaluate roadway segments and intersections in accordance with SANTEC guidelines based on the following conditions:
- a) Existing condition
 - b) Existing + project without mitigation (to determine project impacts)
 - c) Existing + project + project mitigation improvements (short term)
 - d) Existing + project + project mitigation improvements + pending City and County projects with direct and indirect traffic impact on the study area (mid term)
 - e) 2030 traffic with and without the project (including with and without the Citracado Parkway southerly bridge and roadway extension to I-15)
 - f) Evaluation of traffic impact with and without extension of Citracado Parkway between Harmony Grove Road and Avenida Del Diablo.

The project proposes a new road ("Village Road") extending across Escondido Creek and connecting to Avenida Del Diablo within Escondido as an alternative to the widening of Harmony Grove Road north of the Harmony Grove Road / "Village Road" intersection. The City's Circulation Element does not include this connection to Avenida Del Diablo. City staff has discussed this modification to the City and County Circulation plans and have indicated that the City cannot support the Avenida Del Diablo connection without a plan for the future extension of Citracado Parkway across the creek connecting to the Escondido Research and Technology Center (ERTC) project north of Harmony Grove Road, as identified in the City's circulation plan. Therefore an analysis of the offsite improvements including the Citracado Parkway extension should be included in the analysis. Additionally, the indirect impacts of the newly proposed road (such as new sources of noise, lighting and the associated effects on Escondido Creek habitat) should be evaluated.

The proposed sewer package plant anticipates onsite treatment and disposal of Title 22 reclaimed water for irrigation use. The EIR should evaluate the adequacy of the onsite storage system capacity during wet weather times when disposal via irrigation is infeasible. Measures to provide adequate retention and prevent unauthorized discharges to Escondido Creek should be identified.

Water service is provided primarily by the Rincon del Diablo Municipal Water District. The City of Escondido is the primary supplier to the Rincon District, and the City's Water Master Plan did not anticipate the increased densities proposed. In accordance with SB 610 a water supply assessment needs to be performed to evaluate how the district will augment its water supply to serve the increased density.

With respect to Fire service, the Escondido Fire Chief has indicated a concern that the City's mutual aid responsibilities may be compromised given the more urban level densities proposed for Harmony Grove with fire protection services provided by a volunteer agency. The increased density proposed in Harmony Grove Village represents a significant departure from the City's planned densities for the area; consequently, the project should include construction of a fire station adequate in size and staffing to serve the Harmony Grove Village Project with an urban level of service. The EIR should evaluate fire protection needs for the proposed density increase to ensure adequacy, including what measures are required to insure that City fire services and improvements are not impacted by the proposed land use change. The need and timing of construction of a new fire station should be evaluated.

Gary Pryor
August 2, 2004
Page 4

The City of Escondido staff is available to meet discuss the traffic analysis methodologies and other issues raised in this letter. We appreciate the opportunity to comment on the NOP and look forward to receiving a copy of the Draft EIR addressing the above-described concerns. Please feel free to call either myself at (760) 839-4541, or Barbara Redlitz, Principal Planer, at (760) 839-4546, if you have any questions.

Sincerely,



Charles D. Grimm
Director of Community Development

cc: Clay Phillips, City Manager
Patrick Thomas, Public Works Director
Vic Reed, Fire Chief
Barbara Redlitz, Principal Planner



401 B Street, Suite 800
San Diego, CA 92101-4231
(619) 699-1900
Fax (619) 699-1905
www.sandag.org

July 7, 2004

Ms. Kristin Blackson
Department of Planning and Land Use
County of San Diego
5201 Ruffin Road, Suite B
San Diego, CA 92123

Dear Ms. Blackson:

Subject: NOP – HARMONY GROVE VILLAGE

SANDAG would like the opportunity to comment on the above-referenced project. As the Congestion Management Agency for the San Diego region, SANDAG is responsible for preparing and coordinating the implementation of a Congestion Management Program (CMP) for the region. One of the requirements of the CMP is that local jurisdictions implement a CMP Land Use Analysis Program requiring enhanced California Environmental Quality Act (CEQA) reviews for large projects. A large project is defined as:

a project that upon completion would be expected to generate either an equivalent of 2,400 or more average daily vehicle or 200 or more peak-hour trips

Attached for your use are the most current CMP guidelines for implementing the Land Use Analysis Program, including the enhanced CEQA review. SANDAG would request that when preparing the Environmental Impact Report (EIR) for the above-referenced project, you address the CMP requirements in the EIR scope.

The CMP also encourages the appropriate mitigation of significant project impacts so as to minimize future congestion on the CMP roadway system. In addition to traditional roadway and signal improvement strategies, the CMP also provides a broad range of other mitigation measures such as transit, pedestrian, and travel demand management strategies. These new strategies can be found in a report titled "Congestion Mitigation Strategies Research." This report can be downloaded from the SANDAG website at:

http://www.sandag.org/uploads/projectid/projectid_13_2682.pdf

We encourage you to consider these strategies in the development and review of the project environmental document.

MEMBER AGENCIES

Cities of
Carlsbad
Chula Vista
Coronado
Del Mar
El Cajon
Encinitas
Escondido
Imperial Beach
La Mesa
Lemon Grove
National City
Oceanside
Poway
San Diego
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and
County of San Diego

ADVISORY MEMBERS

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of Transportation
Metropolitan Transit System
North San Diego County
Transit Development Board
United States
Department of Defense
San Diego
Unified Port District
San Diego County
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Baja California/Mexico

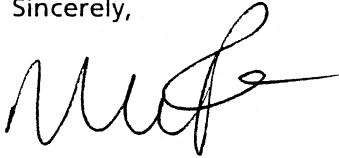
Ms. Kristin Blackson

July 7, 2004

Page 2

Should you have any questions concerning our request or the CMP, please contact me at (619) 699-1954 or mor@sandag.org. We look forward to reviewing a copy of the draft EIR upon completion.

Sincerely,

A handwritten signature in black ink, appearing to read 'M. Oropeza', with a stylized flourish at the end.

MARIO R. OROPEZA
Project Manager

MO/TF/sgr

Attachment: CMP Land Use Analysis Program Excerpt

cc: Shelby Tucker, SANDAG

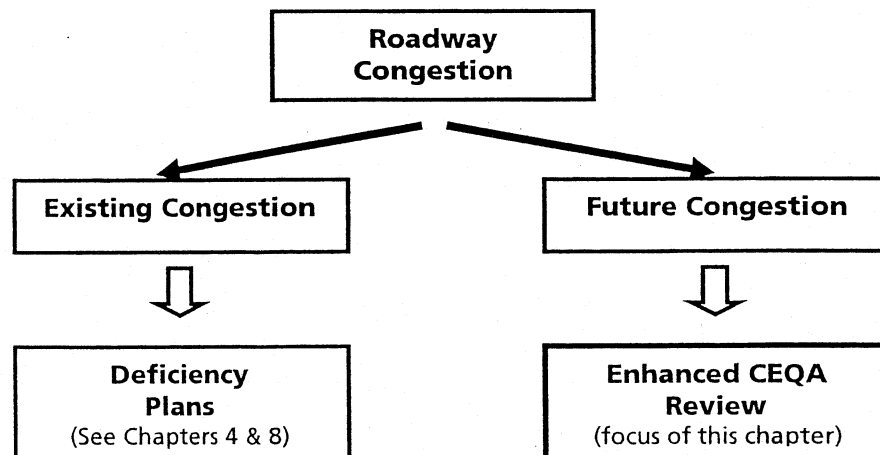
CHAPTER 6: LAND USE ANALYSIS PROGRAM

INTRODUCTION

The California Environmental Quality Act (CEQA) requires that all jurisdictions in the State of California evaluate the potential environmental impacts caused by new development or projects. If impacts are identified, then potential mitigation measures are evaluated and recommended. While cities and the County routinely examine and mitigate impacts to transportation services and facilities within their jurisdiction, this commitment often does not extend to the CMP system (as defined in Chapter 4). State statute highlights the responsibility of local jurisdictions to consider the impact of new development on the CMP system as part of their decision-making process.

The Land Use Analysis Program is an information sharing process that seeks to improve communication between public agencies, private entities and the general public, regarding the impact of new development on the CMP system. It provides a consistent methodology for examining CMP system impacts in an Environmental Impact Report (EIR). This will aid local jurisdictions in determining when mitigation is recommended, and what mitigation strategies are most appropriate.

As shown in the diagram below, the focus of this chapter is on strategies to identify and to address future congestion resulting from new development. Existing congestion is addressed through ongoing roadway monitoring and the preparation of Deficiency Plans as described in Chapters 4 (Transportation System Performance Evaluation) and 8 (Deficiency Plan).



LEGISLATIVE REQUIREMENTS

The requirements for the land use impact element of the CMP can be found in Section 65089(4) of the State of California Government Code (see Appendix F). Those requirements are paraphrased below.

- Develop a program to analyze the impacts of land use decisions made by local jurisdictions on the CMP system;
- Include an estimate of costs associated with mitigating those impacts;
- To the extent possible, use the Performance Element measures developed (see Chapter 4) to measure impacts to the CMP system;
- Exclude the costs of mitigating the impacts of interregional travel;
- Provide credit for local public and private contributions for improvements to the CMP system; and
- Incorporate the requirements and analysis under CEQA.

Related to the land use program requirements, the CMP statute also requires that SANDAG, in consultation with the cities and the County, develop a uniform database to assess traffic impacts of new development and to incorporate the results in a countywide transportation computer model. SANDAG also is to review and approve transportation computer models of specific areas within the region that will be used by local jurisdictions to determine the quantitative impacts of development on the circulation system. These models are to be based on a countywide model and be consistent with the modeling methodology and the databases used by SANDAG.

ISSUES

Under current CEQA practices, full project mitigation may not always be possible due to a number of reasons, including, but not limited to institutional considerations, infeasible nature of the proposed mitigation measures, or cost. Additionally, a project's contribution to cumulative traffic impacts on the CMP system may not be mitigated, which over time may result in unacceptable levels of service where no single project is responsible. Finally, local jurisdictions may make a finding of "overriding considerations" and approve a project without mitigating the project impacts. This unmitigated traffic becomes the responsibility of local jurisdictions or through SANDAG's Regional Transportation Plan. Given these considerations, a better means to maintain the link between new development project impacts and a project sponsor's mitigation responsibilities needs to be pursued.

As discussed in Chapter 5, Transportation Demand Management, SANDAG is working on a number of programs to define and promote "smart growth" as one means to better integrate land use and transportation decisions and to improve the quality of life in the region. Two of the smart growth strategies being investigated include locating higher development densities near transit stations and encouraging compatible mixed land uses. Whereas these strategies support the goals of smart growth, current CMP enhanced land use analysis requirements may discourage these types of development since smart growth developments often generate more peak hour trips within the focus areas than traditional development and thus may require increased project mitigation under the CMP. On the other hand, smart growth has the potential to reduce overall congestion on the larger, regional transportation system.

RECOMMENDED APPROACH

The SANDAG approach in meeting the CMP land use impact element requirements consists of four strategies: enhanced CEQA project review (land use analysis program), project mitigation resources, preparation and dissemination of project design guidelines, and regional modeling consistency. These strategies are further discussed below.

Enhanced CEQA Project Review

An enhanced CEQA review process has been established for use by local jurisdictions and/or project sponsors to conduct traffic impact studies and provide mitigation for new large project impacts on the CMP transportation system. Local agencies are required to adopt and continually implement this enhanced CEQA review process. The key features of this process include:

- A large project is defined as generating, upon its completion, an equivalent of 2,400 or more average daily vehicle trips or 200 or more peak-hour vehicle trips.
- The review is to include a traffic impact analysis (Traffic Impact Study - TIS) and mitigation for project impacts to the regional transportation system. Updated Traffic Impact Study guidelines have been prepared and are incorporated into this update (refer to Appendix D).
- The traffic impact analysis must identify the project's impacts on the CMP transportation system, their associated costs, and appropriate mitigation.
- Early project coordination with affected public agencies and transportation operators is required.
- Local agencies are to coordinate with NCTD and/or MTDB to ensure that transit operators evaluate the impact of new development on CMP transit performance measures.

State regulation requires that all environmental documents prepared for projects in the San Diego region be submitted to the State Clearinghouse, and the State Clearinghouse in turn advises SANDAG of documents it has received. In many instances project sponsors also send a copy of environmental documents directly to SANDAG. Under its regional intergovernmental review program, SANDAG reviews and comments on environmental documents submitted by various agencies. As part of that process, the documents are reviewed to ensure that the enhanced CEQA review process is followed for large projects, and the results of the required traffic analyses and identified mitigation measures are adequate. Comments, when appropriate, are submitted to the lead agency for the environmental review.

2002 CMP Update Changes

The following changes in the Enhanced CEQA Project Review process are incorporated into this update.

Updated Traffic Impact Studies Guidelines - As noted earlier, updated Traffic Impact Studies (TIS) guidelines have been incorporated into the CMP (Appendix D). These guidelines were prepared jointly by the San Diego Traffic Engineer Council (SANTEC) and the Institute of Transportation Engineers (ITS – California Border Section) in 2000.

Project Mitigation Resources

Resources currently available to mitigate the impacts of new development include specific project mitigation negotiated between the project sponsor and local jurisdictions, local agency funding, and regional funding made available through the Regional Transportation Improvement Program process. Additional new resources and strategies identified this CMP update are discussed below.

2002 CMP Update Changes

The following changes in project mitigation resources are incorporated into this update.

Promote TDM Project Mitigation Strategies: Develop and disseminate information on alternative transportation strategies for local agency and private developer use in mitigating the impacts of development activity. This information would be based upon the “Toolbox of Mitigation Strategies” and “Model TDM Program/Ordinance” referenced in Chapter 5, Transportation Demand Management. These strategies also could be used in preparing Deficiency Plans (see Chapter 8).

Ensure Appropriate Mitigation of Significant Project Impacts: It is the goal of the CMP to ensure appropriate mitigation of significant new large project impacts on the CMP system through use of congestion management strategies (CMP roadway or transit improvements and/or non-traditional approaches, such as Transportation Demand Management) contained within the CMP, including specific strategies identified in adopted Deficiency Plans. For the purpose of meeting CMP requirements, these guidelines do not apply to mitigation which would necessitate construction of freeway improvements, including interchanges until such time that Deficiency Plans have been prepared and adopted identifying specific improvements necessary to bring the freeway segments into conformance with the CMP LOS standard. Mitigation of project impacts may include demand management strategies and/or fair share contributions toward future improvements to be identified with the Deficiency Plan. The Deficiency Plans will identify potential funding sources to implement the recommended improvements including, but not limited to federal, state, local, and private funding sources. The preceding restriction regarding freeway improvements applies only to the CMP project review process and is not intended to limit a local jurisdiction’s responsibility under CEQA for ongoing review and mitigation for projects that would impact freeways.

The following guidelines are provided to assist in meeting this goal.

New Large Project – A new development project generating, upon its completion, an equivalent of 2,400 or more new average daily vehicle trips, or 200 or more new peak-hour vehicle trips.

Significant Impacts – An increase in traffic on the CMP system generated by the project that exceeds the standards summarized below which are provided in the Traffic Impact Studies Guidelines (See Table D-1 in Appendix D for a further explanation on how to use these standards).

Level of Service with Project	Allowable Change due to Project Impact					
	Freeways ¹		Roadway Segments		Intersections	Ramp Metering ¹
	V/C	Speed (mph)	V/C	Speed (mph)	Delay (sec.)	Delay (min.)
D, E, & F (or ramp meter delays above 15 min.)	0.01	1	0.02	1	2	2
¹ These guidelines apply only to freeways with adopted Deficiency Plans.						

Project Mitigation – Actions necessary to reduce the project impacts on the CMP system below to or below the standards summarized above and provided in the Traffic Impact Studies Guidelines (Table D-1 in Appendix D).

Available Mitigation Measures - Measures available to mitigate project impacts include, but are not limited to, the measures listed below. The best mix of mitigation measures will vary based on the nature of the development project, nearby land uses and densities, and strategy availability.

- Traditional roadway and/or transit improvements
- Transportation Demand Management or Transportation System Management strategies
- Project Design Guidelines (discussed later in this chapter).
- Additional CMP Toolbox of Mitigation Strategies (to be prepared in 2003)
- Model TDM Program/Ordinance (to be prepared in 2003)

Local jurisdictions have sole responsibility for approving any specific mitigation measures, proposed funding, and/or implementation responsibilities resulting from the enhanced CEQA project review process.

Project Design Guidelines

In support of the CMP and other planning activities, project design guidelines to promote alternative travel modes including walking, bicycle, ridesharing, and public transit have been prepared. The available guidelines are listed below and are available for local agency use in mitigating the impacts of new development projects and in preparing CMP Deficiency Plans.

- "Designing for Transit" (Metropolitan Transit Development Board – July 1993)
- "Land Use Distribution Element of the Regional Growth Management Strategy" (San Diego Association of Governments – February 1995)
- "Tools for Reducing Vehicle Trips Through Land Use Design" (San Diego County Air Pollution Control District – January 1998)
- "Bikeway Planning and Design – California Highway Design Manual" (Caltrans – February 2001)
- "Regional Transit Vision" (San Diego Association of Governments, Metropolitan Transit Development Board, and North San Diego County Transit Development Board – November 2001)
- "Planning and Designing For Pedestrians" (San Diego Association of Governments – June 2002)

Regional Modeling

When evaluating the traffic impacts of any large project, it is SANDAG's goal that a common database and comparable traffic forecast models are used to ensure that all projects are evaluated on a uniform basis. This can be accomplished by local jurisdictions use the most current SANDAG regional or subarea traffic forecasting model, or any other local traffic analysis model that has been approved by SANDAG for use in CMP traffic analysis. Local jurisdictions also are required to use SANDAG's most recent Regional Growth Forecasts as the basic population and land use database.

In addition, local jurisdictions are to provide SANDAG, as part of each Regional Growth Forecast update, information regarding changes to general plan land use designations, major new development approvals, and smaller project information, for use in SANDAG's cumulative traffic forecast analysis. The information is to be provided in the manner, form, and schedule established as part of the Regional Growth Forecast update and review process for local agency information. This information is used to assess the cumulative impacts of all traffic impact analyses completed to date.

RECOMMENDED FOR FURTHER STUDY

In addition to the CMP changes previously noted, the following actions are recommended for further study and potential incorporation into the CMP at a later date:

Reexamine Traffic Impact Studies (TIS) Guidelines: Initiate a study to determine how to incorporate into the TIS guidelines: (1) CMP Performance Element measures; (2) trip generation and distribution rate adjustments for smart growth-supportive land uses; and (3) potential TDM mitigation strategies.

Evaluate Additional Land Use Analysis Program Modifications: Reexamine the CMP Land Use Analysis Program requirements in light of the efforts to develop a Regional Comprehensive Plan and changes in smart growth policies and strategies in the San Diego region. This evaluation would look at potential modifications to be consistent with smart growth including, but not limited to:

- Adjustments in trip generation rates;
- Adjustments in criteria for determining significant impacts;
- Alternative procedures for evaluating/mitigating smart growth projects under the CMP Enhanced CEQA Review

IMPLEMENTATION

Implementation of the preceding land use analyses program recommendations will be the joint responsibility of several agencies, including SANDAG, cities and County, Caltrans, MTDB, NCTD, and the San Diego Air Pollution Control District (APCD). Their respective responsibilities are summarized below in Table 6-1 below.

Table 6-1 Land Use Analysis Program Recommendations Responsibilities					
	SANDAG	Cities*/ County*	Caltrans	MTDB/ NCTD	APCD
Enhanced CEQA Review	D / M	R / A	R / M	R / M	R / M
Updated TIS Guidelines	D / M	D / R / A	R	R	R
Promote TDM Measures	D / M	R / A	R	R	R
Full Mitigation Goal	M	R / A	M	M	M
Regional Modeling	D / M	R / A	R	R	R
Project Design Guidelines	D / R	R / A	R	D / R / M	D / R / M
Future Program Modifications	D	R / A	R	R	R

*Including private developers

Key:

- D – Develop Initial Proposals
- R – Review and Comment
- A – Adopt or Implement
- M – Monitor



1600 Pacific Highway • Room 452 • San Diego, CA 92101
(619) 531-5400 • FAX (619) 557-4190

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Municipal Water District

Betty Rexford
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(Vacant)
Councilmember
City of San Diego

Executive Officer

Michael D. Ott

Counsel

William D. Smith

July 20, 2004

Kristin Blackson
County of San Diego
Department of Planning and Land Use
5201 Ruffin Rd., Suite B
San Diego, CA 92123-1666

SUBJECT: Notice of Preparation of Harmony Grove Village EIR (SP04-03, GPA04-04, TM5365, Log No. 04-08-011)

Dear Ms. Blackson:

Thank you for allowing the San Diego LAFCO to provide comments on the above referenced project. LAFCO is responsible for encouraging the efficient provision of public services and has purview over changes to local government organization and any associated sphere of influence actions. Usually, LAFCO is a responsible agency for environmental review when jurisdictional changes and/or sphere amendments are proposed. Within its discretionary review, LAFCO can only utilize environmental documents that contain a discussion of the ability of existing agencies to provide services, a description of existing infrastructure, how the project area is proposed to receive public services, and the associated jurisdictional, sphere of influence, and municipal service review changes. Therefore, we offer the following comments:

The proposed project intends to construct a "sewer package treatment plant" that will involve the formation of a County Sanitation District or California Water District to own and operate the facility. According to the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000, "...When the formation of a new government entity is proposed, (LAFCO) shall make a determination as to whether existing agencies can feasibly provide the needed service or services in a more efficient and accountable manner. If a new single-purpose agency is deemed necessary, (LAFCO) shall consider reorganization with other single-purpose agencies that provide related services." (GC Section 56301)

As San Diego LAFCO directives and State Law encourage the use of existing agencies to provide government services prior to formation of new entities, the EIR should contain a discussion of the alternate means of utilizing the existing special districts to provide sewer service to the proposed project area.

Two of the parcels in the proposed project area are within the service boundary of the Vallecitos Water District (VWD) and the San Marcos Fire Protection District (FPD); the rest of the proposed project area is within the Rincon del Diablo Municipal Water District (MWD) and County Service Area (CSA) No. 107 (Elfin Forest Fire Department). The VWD is authorized to provide both water and sewer service within its service boundary. The Rincon del Diablo MWD is only authorized to provide water service within its boundary, and fire protection services within its Improvement District "E".

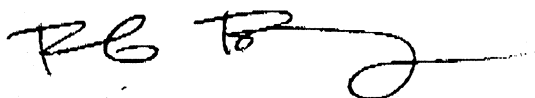
Development of the proposed project may involve detachment of the two parcels from VWD and the San Marcos FPD, and annexation of the same parcels to Rincon del Diablo MWD and CSA No. 107 (Elfin Forest Fire Department). This reorganization would consolidate water and fire protection services to the proposed project area. As the two parcels are not in the adopted sphere of influence of Rincon del Diablo MWD or CSA No. 107, sphere amendments would also be required. Please include a discussion in the EIR of these potential jurisdictional and sphere actions and their effects on completed or pending LAFCO municipal service reviews.

An additional jurisdictional option could involve annexation of the proposed project area to the VWD, which has sewer provision powers. Activation of the latent sewer powers of the Rincon del Diablo MWD to include the proposed project area may also be an option. These alternate options should be discussed in detail with the affected districts to determine the most efficient means of providing sewer service to the proposed project area, as well as an examination of any financial impacts to the districts' ability to provide future services. The EIR should include an analysis of these alternatives prior to concluding that the formation of a new County Sanitation District or California Water District would be the best arrangement to own and operate the proposed sewage treatment plant.

The proposed project area is listed on the State of California's Farmland Mapping and Monitoring Program as containing "Unique Farmland," and "Farmland of Local Importance." LAFCO policies and statutes require discouragement of conversion of prime agricultural or open space lands to other uses unless such an action would not promote the planned, orderly, efficient development of an area, or the affected jurisdiction has identified all prime agricultural lands within its sphere of influence and adopted measures that would effectively preserve prime agricultural lands for agricultural use. LAFCO defines "Prime Agricultural Land" as lands qualified for rating as class I or II in the USDA Natural Resources Conservation Service land use capability classification. Please include a discussion of the conversion of this farmland and whether it qualifies as Prime Agricultural Land, as defined by LAFCO. A copy of the San Diego LAFCO Preservation of Open Space and Agricultural Lands policy and Government Code Section 56064 is attached.

Because the proposed project requires changes to local governmental organization and adopted spheres of influence, San Diego LAFCO will be a responsible agency for environmental review. Should you have any questions, or if San Diego LAFCO may be of any further assistance, please contact me at (619) 531-5409.

Sincerely,

A handwritten signature in black ink, appearing to read 'RB Barry', with a long horizontal flourish extending to the right.

ROBERT BARRY
Local Governmental Analyst

RB:tjc

AUGUST 2, 2004

THE SAN DIEGUITO PLANNING GROUP
P.O. BOX 2789
RANCHO SANTA FE, CA 92067

Kristin Blackson
Department of Planning and Land Use
County of San Diego
5201 Ruffin Road, Suite B
San Diego, CA 92123-1666

REF: Response to the NUW Harmony Grove Village NOP

Dear Ms. Blackson,

After review and public meetings conducted by the EFHGTC (Elfin Forest Harmony Grove Town Council), the San Dieguito Planning Group is submitting the following comments on the Notice of Preparation for Harmony Grove Village.

Traffic

1. Evaluate traffic impact of the proposed Village densities and Village Drive to Elfin Forest Road, Country Club Drive, Kauana Loa, and Harmony Grove Road using a model that is based on community traffic goals submitted by the EFHGTC of downsizing these roads to a maximum of 2 lanes with weight limits and low residential speed limits and of eliminating SC1375 from the county circulation element. Assess street size (number of lanes, speed limit) needed in village center, portion of Country Club Drive from Harmony Grove Road to Village Drive, and Village Drive with any possible extension to Avenida del Diablo, to encourage use by Village residents and commercial business and to redirect such traffic from local roads for which community has requested downsizing. Perform this evaluation based on proposed buildout (741 DUs) and with a number of DUs that would preserve these roads in their current configuration and below a LOS F.
2. Evaluate the traffic impact of the private equestrian center, to include number of trips and routes taken, on existing roads (Country Club Drive, Harmony Grove east and west) and on the Arizona Crossing over Escondido Creek, as compared to its current land use as a commercial dairy. When calculating requirements for the Arizona Crossing, note that this creek crossing has already had one fatality during flooding of this area. Analyze any growth-inducing impacts of upgrading the Arizona Crossing, especially with regard to community goals of eliminating SC1375 from the county circulation.
3. Evaluate the traffic impact specifically for the commercial businesses in the village center, and model the traffic with the proposed weight limits for Country Club Drive north of Village Drive and Harmony Grove Road outside of the

project (note that Elfin Forest Road and the northernmost part of Country Club Drive already have a 7-ton weight limit).

4. Analyze impact of project density on the stated community goal of preserving the unique rural character of the area: please reference EFHGTC community character statement and reference recent removal of area from Escondido SOI for stated purpose of staying preserving rural character.
5. Analyze traffic impact on existing local roads if Citracado extension from the ERTC in Escondido to Avenida del Diablo in the unincorporated county is not completed before development starts and before homes are occupied. Evaluate impact on community character and goals if project is delayed until Citracado is completed.
6. Evaluate impact of construction traffic on Country Club, Kauana Loa and Harmony Grove Road, with particular attention to the safety and welfare of horse back riders, hikers, and bicycle riders, given the number of both in the immediate vicinity and the existing hiking, riding trails, and bicycle lanes/routes along these routes.

Scope and Community Character

7. Measure all impacts to community goals at three densities: the density allowed in the current general plan (expected to be 193 DUs), and the density proposed by New Urban West's proposed general plan amendment (expected to be 742 DUs), and the density allowed by the county's proposed GP 2020 April working copy draft (expected to be 800+), in terms of meeting community character goals.
8. Analyze impacts on entire community to include all of Elfin Forest and Harmony Grove to the county boundary, the Elfin Forest Preserve, the Spiritual Center, and Eden Valley.
9. Use existing community character documents for Elfin Forest, Harmony Grove, and Eden Valley and traffic goals letters (provided by EFHGTC) as the standards for calculating the impact on all aspects of community character.
10. Evaluate potential impact, identify mitigation from construction, residences, commercial, and private equestrian facility on existing archeological resources.
11. Evaluate potential impact, identify mitigation from construction, residences, commercial, and private equestrian facility on existing historical buildings: old farmhouse and adobe, and any historic buildings in the Spiritual Center.
12. Calculate potential risk, identify mitigation to prevent village density from encouraging further subdivision and increasing density on adjoining and nearby parcels.
13. Identify mitigation to prevent residents of the new development from misunderstanding and potentially changing the character of the neighboring rural communities. Evaluate feasibility of requiring signature of a disclosure that explains impacts of large animal and farm animal keeping and related equestrian recreational uses in the community, linking trail systems, and local wildlife (including coyotes), and nearby fire hazards.
14. Analyze impact of Village development on Elfin Forest Harmony Grove Fire department and existing and proposed funding sources within the current CSA107 boundaries.

15. Identify how this development will impact and contribute toward the maintenance of the existing and proposed community's trail system and roads.
16. Given the proximity of the private equestrian center to the proposed Village Core, evaluate mitigation to prevent private equestrian facility from being sold and rezoned high-density residential, commercial or other purpose.
17. Describe the equestrian facility; hours of operation, restriction for use, management of animal waste, etc.

Aesthetics

18. Analyze visual impacts of utilities with possibility of undergrounding so they do not compromise existing view corridors.
19. Analyze visual impacts of proposed development with stated community character goals.

Community Safety and Nuisance

20. Identify impact and mitigation to provide sufficient sheriff and fire protection for the increased population.
21. Calculate potential risk and identify mitigation to prevent village density from increasing wildland and brush fire risk in neighboring communities and resources, to include the Elfin Forest Preserve, Spiritual Center, and historical buildings. Consider creating a large and manageable fire buffer zone between the Village and surrounding rural communities.
22. Identify impact and mitigation from light and noise generated both during construction and after build-out, with special attention to rural nature of community. List proposed mitigation to safeguard public and animal health and welfare during construction and notify residents of possible safety issues in a timely manner. Include impacts of light and noise from commercial and equestrian facilities. Reference community character documents that describe dark sky requirements and preference for no active-use parks with lights (such as a ballpark).

Environmental Resources

23. Perform a full biological assessment to identify the impact on the Escondido Creek and existing watershed due to runoff from homes, businesses, and the equestrian facilities, and also due to improved water pathways proposed to run through the development, versus a no-change alternative. Evaluate potential impact and identify mitigation using worst storm conditions. Evaluate benefit of mitigation that includes limiting hardscape and using development structures that are permeable and/or landscaped swales to absorb water before it can reach the creek and deliver accumulated toxins.
24. Open areas are interwoven between residential areas, limiting their usefulness for wildlife or native habitat. Identify impact and mitigation on existing contiguous regionally significant open space and wildlife corridors. Address mitigation for all sensitive plants (west coast ceanothus and San Diego sagewort) and animals (California gnatcatcher, Cooper's hawk, red-shouldered hawk, turkey vulture, San Diego black-tailed jackrabbit).

25. Take into account the community's stated goals of no extractive land use when considering impacts of loss of geologic resources, as well as impacts of such use on noise and air pollution and traffic.
26. Take into account the need for any required mitigation land to be purchased within the Harmony Grove, Elfin Forest, and Eden Valley area to enable our community to meet its stated goal of keeping a rural character.

Sewage Treatment Plant

27. Describe how a 'stand alone' Sewage Treatment Plant operates. If there is no direct connection to an outfall infrastructure, how is sludge and solid waste material removed? What kind of transport, how many trips and what route is to be used?
28. Analyze impacts of the transport of any hazardous materials from the Village (including waste from the sewage treatment plant) increasing the risk of such material reaching Escondido Creek or contaminating ground water.
29. Evaluate potential impact, identify mitigation to prevent various sewage treatment plant failures from impacting Escondido Creek. Identify the routes for piping waste into and out of the plant.
30. This area is currently zoned for density levels that can be supported by septic. A sewage treatment plant will put that density level at risk for any adjacent communities, with an unknown boundary limit for impact. Evaluate potential impact, identify mitigation to prevent the plant from being expanded to support future density increases. Include whether creation of a closed system will mitigate this risk.

Services

31. Schools; describe need or lack of need for K-5, middle school, and high school in project boundary. Since no busing service exists, show traffic study with impacts of transporting Village students to and from designated schools.
32. Does the existing Water Utility have enough water and infrastructure to support a project of this size and density?
33. Trash removal; please describe services to be provided. What is the impact to traffic roads and landfills. What recycling programs will be established such as curb-side recycling?
34. Public safety; how will police and fire protection be established, expanded and funded to support a project of this size and density?

Thank you for this opportunity to submit comments.

Regards,

Douglas Dill

Vice-Chair

San Dieguito Planning Group



20223 Elfin Forest Rd. Elfin Forest, CA 92029

2004-5 Board Members:

Mid Hoppenrath (chair)
Jan Denny (vice-chair)
Evelyn Alemanni
Patti Newton
Greg Parman
Eric Anderson
Robert McGurk
Arie Franken
Terry Walsh

Kristin Blackson, County of San Diego Dept. Planning and Land Use,
5201 Ruffin Road, Suite B, San Diego, CA 92123-1666

Aug. 2, 2004

Dear Kristin,

After extensive review, public meetings, and effort, the Elfin Forest Harmony Grove Town Council is submitting the following comments on the Notice of Preparation for Harmony Grove Village (ENV. Review Number 04-08-011). This project is the largest housing project undertaken in this community, and will have many significant impacts as detailed in the NOP. It is important to the Town Council and the community that the information included in the environmental review process is as complete and clear as possible. The following comments are specific to the issues in the NOP, and are written to ensure the information developed and distributed in the EIR will clearly address the issues of concern to our community.

Traffic:

1. Evaluate the traffic impact of the proposed village densities and Village Drive to Elfin Forest Road, Country Club Drive, Kauana Loa, and Harmony Grove Road using a model based on community traffic goals (letter included) of downsizing these roads to a maximum of two lanes with weight limits, low residential speed limits, and elimination of SC1375 from the county circulation element. Assess street size (number of lanes, speed limit) needed in the village center portion of Country Club Drive from Harmony Grove Road to Village Drive. Examine the possible extension of Village Drive to Avenida del Diablo to encourage use by village residents and commercial business. This would serve to redirect such traffic from local roads for which the community has requested downsizing. Perform these evaluations using the proposed build out figure of 741 homes and also with a number of homes that would preserve these roads in their current configuration (and below a LOS F).
2. Evaluate the traffic impact of the privately owned equestrian center to include ADTs and probable routes on existing roads (Country Club Drive, Harmony Grove east and west) and on the Arizona Crossing over Escondido Creek, as compared to its current use as a commercial dairy. When calculating requirements for the Arizona Crossing, note that this creek crossing has already had one fatality during flooding of this area. Analyze any growth-inducing impacts of upgrading the Arizona Crossing, especially with regard to the community goal of eliminating SC1375 from the county circulation.

3. Evaluate the traffic impact specifically relative to commercial businesses in the village center, and model the traffic with the proposed weight limits for Country Club Drive north of Village Drive and Harmony Grove Road outside of the project (note that Elfin Forest Road and the northernmost part of Country Club Drive already have a 7-ton weight limit).
4. Analyze the impact of project density on the unique rural character of the area (as stated in the enclosed community character statement). Note the recent removal of Harmony Grove from the Escondido SOI in an effort to preserve its rural character.
5. Analyze the traffic impact on existing local roads if the Citracado extension from the ERTC in Escondido to Avenida del Diablo in the unincorporated area is not completed before development starts and before homes are occupied. Evaluate the impact on community character and goals if project is delayed until Citracado is completed.
6. Evaluate the impact of construction traffic on Country Club, Kauana Loa, and Harmony Grove Road, with particular attention to the safety and welfare of horseback riders, hikers, and bicyclists. The existing trails, and bicycle lanes run along these routes and are heavily used.

Scope and Community Character:

7. Measure all impacts to community goals at three densities: the density allowed in the current general plan (expected to be 193 du), and the density proposed by New Urban West's proposed general plan amendment (expected to be 742 du), and the density allowed by the county's proposed April 2004 GP 2020 draft working copy (expected to be 800+), in terms of meeting community character goals.
8. Analyze impacts on the entire community which includes all of Elfin Forest and Harmony Grove to the county boundary, the Elfin Forest Recreational Reserve, the Harmony Grove Spiritualist Center, and Eden Valley.
9. Use existing Elfin Forest, Harmony Grove, and Eden Valley community character documents and traffic goals letters (enclosed) as the standards for calculating the impact on all aspects of community character.
10. Evaluate the potential impacts and identify appropriate mitigation measures relating to construction activities residences, commercial, and private equestrian facility on existing archeological resources.
11. Evaluate the potential impacts and identify appropriate mitigation measures relating to construction activities, residences, commercial, and private equestrian facility on existing historical buildings: the old farmhouse and adobe ruins, and any historic buildings in the Spiritualist Center.
12. Calculate potential risk, identify mitigation to prevent village density from encouraging further subdivision and increasing density on nearby lots.
13. Identify mitigation to prevent NUW residents from misunderstanding and potentially changing the character of the neighboring rural communities. Evaluate the feasibility of

requiring new residents to sign a disclosure explaining the existing rural lifestyle, i.e., large animal and farm animal keeping, equestrian related recreational uses, linking trail systems, and local wildlife (including coyotes), as well as proximate potential fire hazards. Signing would preempt efforts to abate or disrupt this lifestyle.

14. Analyze the impact of village development on the Elfin Forest/Harmony Grove Fire Department and existing and proposed funding sources within current CSA107 boundaries.
15. Identify the effect this development will have and how it will contribute to the maintenance of the existing and proposed community trail system.
16. Given the proximity of the private equestrian center to the proposed village core, evaluate mitigation measures to prevent this facility from being sold and rezoned to, for example, high-density residential.

Aesthetics:

17. Place utilities underground to eliminate any compromise to existing view-sheds.
18. Analyze visual impacts of proposed development with stated community character goals and identify measures to minimize its influence.

Community Safety and Nuisance:

19. Identify impact and mitigation to provide sufficient sheriff and fire protection commensurate to the increased population.
20. Calculate the potential risk and identify mitigation measures to prevent village density from increasing the risk of wild land and brush fires into neighboring communities and resources, including the Elfin Forest Recreational Reserve, Spiritualist Center, and historical buildings. Consider creating a large and manageable fire buffer zone between the village and surrounding rural communities.
21. Identify the impact and mitigation measures for light and noise pollution generated both during construction and upon build-out, with special attention to the rural nature of the community. List proposed mitigation measures to safeguard the public and animal health and welfare during construction. Notify residents of possible safety issues in a timely manner. Include impacts of light and noise pollution from commercial and equestrian facilities. Reference community character documents and county ordinances that describe dark sky requirements. Note the community preference that no active-use parks with lights (such as a ballpark) be permitted.

Environmental Resources:

22. Perform a full biological assessment to identify and mitigate the impact on the creek and existing watershed from NUW project runoff, and also due to improved water pathways proposed to run through the development, versus a no-change alternative (what are we trying to say here?) Evaluate potential impact and identify mitigation using worst-case storm conditions. Evaluate the benefits of limiting hard-scape and using development

structures that are permeable (or semipermeable) and/or the use of landscaped swales to absorb runoff before it can reach the creek.

23. Open areas are interwoven between residential areas, limiting their usefulness to native wildlife and habitat. Identify impact and mitigation on existing contiguous, regionally significant open space and wildlife corridors. Address mitigation for all sensitive plants (west coast ceanothus and San Diego sagewort) and animals (California black-tailed gnatcatcher, Cooper's hawk, red-shouldered hawk, turkey vulture, San Diego black-tailed jackrabbit, etc.).
24. Take into account the community's stated goals of no extractive land use when considering impacts of loss of geologic resources, as well as impacts of such use on noise and air pollution and traffic.
25. Take into account the need for any required mitigation land to be purchased within the Harmony Grove, Elfin Forest, and Eden Valley areas to enable our community to meet its stated goal of keeping a rural character.

Sewage Treatment Plant:

26. Analyze impacts of the transport of any hazardous materials from the village (including waste from the sewage treatment plant) increasing the risk of such material reaching Escondido Creek or contaminating groundwater.
27. Evaluate potential impact and identify mitigation to prevent sewage treatment plant failures from affecting Escondido Creek. Identify the routes for piping waste into and out of the plant.
28. This area is currently zoned for density levels that can be supported by septic. A sewage treatment plant will put that density level at risk for any adjacent communities, with an unknown boundary limit for impact. Evaluate potential impact, identify mitigation to prevent the plant from being expanded to support future density increases. Include whether creation of a closed system will mitigate this risk.
29. NUW states that water from the treatment plant will be used within project boundaries, for example, to irrigate landscaping, etc. Identify how the excess water will be disposed of when demand for it is low or nonexistent.

Sincerely,

Mid Hoppenrath, Chair

The Elfin Forest Harmony Grove Town Council

Statement of Intent

- Common to all community plans. Defines relationship to regional elements. Describes structure of the Community Plan document (*this part written by county planners*).

Table of Contents

1. Introduction

1.1 Location, Physical Characteristics, Population

- *[edit of existing sentence in county-written Introduction]* The Escondido Creek extends from the eastern edge of Harmony Grove with tributaries in Eden Valley, and continues through Elfin Forest to the northern edge of Rancho Santa Fe.
- The communities of Harmony Grove and Eden Valley (HGEV) are situated in two intersecting valleys, one running north-south, and the other running east-west. Both valleys are cradled in dramatic brush-covered hills and granite formations. The valleys, although physically close to urban areas, are isolated by the topography of the surrounding hills, and are rural in character. The valleys are home to a diverse population of native plants and animals, including deer, coyotes, bobcats, golden eagles, hawks, and other raptors, Bells vireos, gnat catchers, ravens, and numerous species of plants. There are a multitude of species that thrive in this area that are on protected lists.
- HGEV geographically sits to the south of Hwy 78, to the west of the western edge of the City of Escondido, to the north of Del Dios Hwy. where Via Rancho Pkwy intersects Del Dios Hwy., and to the east of Elfin Forest Recreational Reserve.

1.2 Historical Context

- The Harmony Grove area was named for the Spiritualist Association that incorporated there in 1896. Eden Valley was formed by an early HOA (no longer operating). The area surrounding Harmony Grove Spiritualist Association was first developed primarily as agriculture lands. In the past few decades significant rural residential development has occurred which has established its rural residential character. Several agricultural operations are finding limits to their operations are leading them to consider re-zoning and re-development in the near future.

1.3 Community Character

- *[edit]* The San Dieguito communities represent areas that are primarily single-family residential communities on large estate lots sprawling over the hillsides.
- Harmony Grove is the oldest of the San Dieguito communities, incorporated in 1896 by the spiritualist association. Its residents, together with those of Eden Valley and Elfin Forest, value open space, quiet, dark nighttime skies, low traffic

volume, and access to the abundant wildlife through protected nature trails. There are no street lights, lighted signs, or traffic signals.

1.4 Vision Statement

- This area is rural in nature, extremely quiet, peaceful, and generally remains in its natural state. The dark night sky is an important aesthetic resource. The most scenic views in Harmony Grove / Eden Valley are of the hills, valleys, and riparian habitat and these visual qualities must be preserved. The area must remain non-industrial and low-density to preserve its rural character.

2. Land Use

The land use element identifies the proposed general distribution and intensity of uses of the land for housing, business, industry, open space, and other categories of public and private uses.

2.1 Existing Conditions

- Large-lot, rural residential and agricultural uses, residential livestock keeping; no established trails; no commercial development; no street lights, no traffic lights, no curbs, no sidewalks, no extractive land uses, no commercial or non-agricultural industry, except for one concrete-pipe plant, and no dedicated open space. Urban areas of Escondido and San Marcos immediately adjoin several areas of HGEV.

2.2 General

- Goals: A rural residential life style built in a fashion that is compatible with and sensitive to its natural setting; unspoiled views of intact hills, valleys, and creeks; a restored/protected watershed, mature native trees; dedicated open space; no noise pollution or air pollution. An equestrian/multi-use trail system connecting to other established trails.
- Policies: Restrict land use primarily to single-family residences; provide for lot sizes that will permit residents to keep leisure and market animals on their property; restore and maintain natural appearance of, and establish public access to portions thereof, watershed and creeks, and riparian areas; mitigation land for development within the community must be purchased within the community to create open space and trails; strictly limit noise and dust during development or operation of businesses; development should be designed to avoid the removal of mature trees; require developers to obtain community review and input of their plans prior to permit approval; maintain open-space buffer between urban areas and rural community to preserve character of unincorporated community; require linking trail systems as a condition of land development.

2.3 Residential

- Goals: Dark nighttime sky; open-access community design that fosters a feeling of "one neighborhood" despite multiple developments. An attractive equestrian community that encourages environmentally sensitive, responsible horse keeping.

Policies: Residential lighting should preserve dark nighttime skies, no street lighting or lighted signage; perimeters of large developments should not restrict

visual or physical pedestrian/equestrian access to community features; developers should design with a rural, country theme as suggested by community brochure; allow for the keeping of equestrian and market animals. Encourage proper maintenance of fences and animal enclosures. Require commercial equestrian facilities to strictly conform to county regulations to ensure maintenance of attractive facilities that enhance the community and promote the health of the animals. Reduce front setback requirements to allow grazing of leisure and market animals in residential front yards. Support the opportunity for home horse keepers to board a very small number of horses to help defray costs of keeping their own animals. Encourage the use of cross-fencing to promote healthy grass pastures and reduce dust, mud, and erosion. Strictly enforce manure and odor control. Promote use of a trail system for the enjoyment of both horses and riders.

2.4 Commercial

- Goals: Small-town feeling for limited commercial developments; land use and business to be compatible with community character and general goals
- Policies: Minimal use of land for commercial development; no large aggregation of commercial businesses; restrict signage and lighting to minimum required for operation and safety, preference given to businesses serving the local community.

2.5 Industrial

- Goals: No industrial uses; no extractive land uses
- Policies: Disallow industrial and extractive land uses

2.6 Specific Plans

-

3. Circulation

The Circulation Element identifies the general location and extent of existing and proposed major thoroughfares, transportation routes, and other local public utilities and facilities. It serves as an infrastructure plan and must correlate with the land use element.

3.1 Existing Conditions

- There are three main roadways in HGEV: Country Club Drive, which extends primarily north-south throughout the length of the community; Kauana Loa Drive, which begins at Country Club Drive and heads east, curving to the south to run together with Harmony Grove Road in Escondido; and Harmony Grove Road, which continues from Escondido in a south-easterly direction through the community. Non-local East-West commuter traffic creates excessive traffic congestion on Harmony Grove Road during rush hours.

3.2 General

- Goals: Quiet residential streets safe for pedestrian, bicycle, and equestrian use; Low traffic volume and low traffic speeds and commercial weight limits; traffic calming areas; scenic highways

- Policies: Limit roads to 2-lane, undivided, curving streets; establish speed and weight limits commensurate with residential equestrian neighborhoods; use traffic calming strategies where necessary; restrict truck traffic to local deliveries; no thruway from major commuter routes; designate existing main roadways as "Scenic Highways."

3.3 Road Network

- Map – for reference only

4. Housing

The Housing Element identifies and analyzes existing and projected housing needs and includes goals and policies, quantified objectives, and scheduled programs for the preservation, improvement, and development of housing. The housing element must address the housing needs of all economic segments of the community.

4.1 Existing Conditions: One- and two-story single-family homes on large lots; large-animal facilities on residential properties; no "cookie-cutter" developments; no walled developments.

4.2 Goals and Policies: Housing developments integrate seamlessly into rural community environment and do not appear to be mixture of walled individual developments. Area has rural "small-town" feeling. Developments do not display signage. Leisure and market animals may graze in fenced front yards. Limit "footprint"-to-lot size, of residences to an appropriate ratio that reflects the community's rural/small village character.

5. Conservation/Open Space*

The Conservation/Open Space Element addresses the identification, conservation, development, and use of natural resources including water, forests, soils, waterways, wildlife, and mineral deposits, as well as the comprehensive and long-range preservation of 'open-space' land.

5.1 Existing Conditions: The area falls within the San Diego Air Basin and is located in an area of high air pollution potential. The topography is characterized by open valley floors associated with Escondido Creek surrounded by gently to steeply sloping hills and by sharp granitic escarpments. A significant portion of the valleys, hills, and ridgelines are in their natural condition, providing natural open space and scenic vistas. Habitats include: sensitive riparian wetlands, oak woodlands, native grasslands, chaparral and coastal sage scrub. The Escondido Creek wildlife corridor runs through the center of Harmony Grove. The area is home to a plethora of rare, sensitive, threatened and endangered plant and animal species.

5.2 Water Resources

- Goals: A rural residential and agricultural community with natural creeks and riparian areas preserved. This community has enough water supplied by water agencies to meet the needs of its citizens.
- Policies: Preserve Escondido Creek in its natural state and ensure that any residential development be adequately separated and buffered from the creek.

Integrate any development plans with the native habitat in such a way as to preserve vast amounts of open space and continuous wildlife corridors. Harmony Grove/Eden Valley shall not be overbuilt with respect the available water to serve its residents.

5.3 Forests

- Goals: Open space preserves of coast live oak riparian forests, oak woodland chaparral, native grasslands and coastal sage scrub
- Policies: Require potential land uses to be integrated into the community plan. Preservation of open space banks of native habitat is a key element of this plan. Developers are required to mitigate for damages by purchasing open space in the area in conjunction with local preservation groups.

5.4 Soil Resources

- Goals: Native soil and topography moderately interspersed with low impact residential and agricultural uses
- Policies: Development of the Harmony Grove/Eden Valley area could significantly impact the establishment of a sensitive lands open-space system because the site contains the Escondido Creek floodplain and riparian vegetation, wetlands, woodland resources and steep slopes. Any development is required to be consistent with the community plan and to only minimally impact soil resources. Topography is to be maintained wherever possible.

5.5 Habitat and Biodiversity

- Goals: A community where all living things including humans, invertebrates, fishes, amphibians and reptiles, birds, mammals and native vegetation live together in harmony
- Policies: Any developments will be in compliance with MSCP, MHCP (Multiple Species Conservation Plan, Multiple Habitat Conservation Plan). Development will comply with the community plan wherein large banks of open space including ridgelines are preserved in their natural habitat. The riparian continuous corridor is preserved and protected. Any possible runoff into the stream is to be abated. Any land developers are required to mitigate loss of habitat and impact to a critical population of sensitive species by purchasing mitigation land to be enjoyed as open space for all in conjunction with local public land trusts. Sensitive habitat shall be preserved through designation as open space and through dedication of open space easements prior to development. A habitat management plan shall be prepared that defines management activities and responsibilities for all designated open space lands and sensitive habitat.

5.6 Mineral Resources

- Goals: Preservation of natural mineral resources.
- Policies: No extractive land uses shall be allowed; site preparation for development shall minimize destruction of natural mineral resources.

5.7 Agricultural Resources

- Goals: Significant agricultural resources including egg ranches, horse ranches, avocado, citrus and deciduous fruit growing operations exist and uphold the rural community character

- Policies: Ensure that agricultural resources be preserved and protected in accordance with community plan.

5.8 Air Quality

- Goals: A clean, safe community with fresh air to breathe
- Policies: Ensure that any developments do not conflict or obstruct the implementation of the San Diego Regional Air Quality Strategies:
 - Do not violate any air quality standard or contribute substantially to an existing or projected air quality violation;
 - Require that the study of the cumulative traffic effects of any proposed development not exceed any of the following daily emissions at a minimum:

▪ Carbon Monoxide (CO)	550 lbs./day
▪ Reactive Organic Gases (ROG)	55 lbs./day
▪ Oxides of Nitrogen (NOx)	55 lbs./day
▪ Fine Particulate Matter (PM10)	150 lbs./day

Do not expose sensitive receptors to substantial pollutant concentrations;

Do not create objectionable odors affecting a substantial number of people.

5.9 Cultural Resources

- Goals: A community of significant prehistoric, and historic cultural resources. Prehistoric resources include petroglyphs, pictographs, some habitation sites, bedrock milling sites, a lithic scatter and a private artifact collection. This area may have housed the prehistoric village of Japatul. Luiseno and Diegueno occupation is evident. In addition, there are several buildings that appear on the 1889/1891 San Luis Rey 15' topographic map, some of these are still standing. The remains of an adobe structure stand near Country Club Drive and Cordrey Drive. Harmony Grove Spiritualist Association and its many associated buildings and residences stand at the heart of Harmony Grove. This association was formed in the late 1800s and is a cultural historic resource.
- Policies: Any development must incorporate the prehistoric and historic rural theme of this community. All cultural resources are valued by the community; they remind the residents of the continuity of the past and the present and provide an invaluable educational and societal resource. These resources will be preserved.

5.10 Dark Skies

- Goals: A community with dark, open nighttime skies.
- Policies: Any development must conform to preserving dark nighttime skies. Limit residential lighting, no street lighting or lighted signage.

5.11 Energy Conservation

- Goals: A rural residential and agricultural community with enough power to meet the needs of its residents.
- Policies: Harmony Grove/Eden Valley shall not be overbuilt with respect to the amount of power required to fuel existing development.

5.12 Scenic Highways

- Goals: Harmony Grove Road as a California scenic highway.
- Policies: Harmony Grove Road and Country Club Drive shall be maintained as 2-lane roads and the cumulative traffic effects of any future developments shall not significantly increase the traffic level and over all quality of life of the community.

*Escondido General Plan Update, First Screencheck Draft Program EIR, City of Escondido, February, 2000, is quoted from loosely in this section.

6. Safety

The Safety Element establishes policies and programs to protect the community from risks associated with seismic, geologic, flood, and wildfire hazards.

- 6.1 Existing Conditions: San Marcos and Elfin Forest (volunteer) fire departments provide emergency medical and fire fighting service; California Highway Patrol provides traffic control and the San Diego Sheriff's Department provides local law enforcement.
- 6.2 Law Enforcement
 - Goals: Safe environment through community design, and participation.
 - Policies: Ensure community design is consistent with overall safety and crime prevention theme; encourage formation of neighborhood watch groups; establish close, regular contact between citizen's groups and both county sheriff department and California Highway Patrol
- 6.3 Fire Protection and Emergency Medical Services
 - Goals: Timely response to fire and medical emergencies
 - Policies: Support volunteer fire department by special taxes and fund raising activities, develop additional fire/police stations in community
- 6.4 Seismic Safety
 - Goals: Structures that withstand reasonable seismic activity
 - Policies: Follow county guidelines
- 6.5 Flood Hazards
 - Goals: Unspoiled floodplain to function as regional open space resource; safe ingress/egress to community during heavy rains; control of path/volume of drain water
 - Policies: Restrict floodplain development to that supportive of the rural lifestyle such as stables, equestrian facilities, agriculture, or recreational uses; use types and patterns of development that minimize water pollution, soil erosion, silting, slide damage, flooding, and hillside cutting and scarring; prohibit excessive and

unsightly elevation of pads in floodplain; construct a traffic bridge over Country Club Drive where it crosses Escondido Creek; enforce county regulations regarding grading.

7. Noise

The Noise Element identifies and appraises noise problems in the community. To the extent possible, current and projected noise levels are calculated and mapped for roadways, railroads, airports, industrial plants, and other major noise sources.

- 7.1 Existing Conditions: The local agricultural industry produces limited mechanical or other noise, area is mostly quiet.
- 7.2 Goals and Policies: Quiet area, free of excessive or objectionable noise. Establish noise standards especially for a rural, as opposed to urban or suburban, community. Allow no industry associated with excessive noise, such as extractive land uses or airports; restrict traffic volume.

8. Public Facilities

The Public Facilities Element is an optional element which provides the policy basis which will guide shorter term documents such as the capital improvements program (CIP) and annual capital budget. This element should also discuss the location of future facilities and improvements, acceptable levels of service, funding priorities, and the timing of availability.

- 8.1 Existing Conditions: There are no public facilities in the HGEV area. The area has no sewer system and uses mainly septic systems for waste disposal. Some areas have well water, others use water supplied by various water districts (Rincon Del Diablo, Olivenhain)
- 8.2 Parks and Recreation
 - Goals: Small neighborhood park, preferably on floodplain near creek, that is accessible by trail system; park should have mature native landscaping, picnic tables and minimal playground equipment, no active recreational facilities or lights and only a small parking area.
 - Policies: Acquire open space for small park on trail route.
- 8.3 Trails
 - Goals: A multi-use trail system linking the HGEV community to major recreational areas such as Lake Hodges, Elfin Forest Preserve, and Jack's Pond.
 - Policies: Acquire open space along proposed trail routes; make dedication of linking trails a condition of development; require developers to consult current county trail maps for the area before submitting permit applications; establish a staging area.
- 8.4 Schools
 - Goals:
 - Policies:

- 8.5 Libraries
 - Goals:
 - Policies:
- 8.6 Fire, Emergency Medical Services and Law Enforcement
 - Goals
 - Policies
- 8.7 Water
 - Goals
 - Policies
- 8.8 Wastewater
 - Goals
 - Policies
- 8.9 Solid Waste
 - Goals
 - Policies

References

Elfin Forest / Harmony Grove Community Guide, 4th ed. Evelyn Alemanni, editor. Elfin Forest, Calif.; Elfin Forest/Harmony Grove Town Council, 2000.

Escondido General Plan Update, First Screencheck Draft Program EIR, City of Escondido, February, 2000

Harmony Grove / Eden Valley Web site. URL: www.hgev.go2click.com. Accessed 10/19/01.



2004-5 Board Members:

Mid Hoppenrath (chair)
Jan Denny (vice-chair)
Evelyn Alemanni
Patti Newton
Greg Parman
Eric Anderson
Robert McGurk
Arie Franken

20223 Elfin Forest Rd. Elfin Forest, CA 92029

Bob Goralka
San Diego County Department of Public Works

March 31, 2004

RE: Recommendations for traffic goals in Elfin Forest and Harmony Grove

The Elfin Forest/Harmony Grove Town Council appreciates this opportunity to inform you of the community's goals for traffic management in our area. The following local traffic goals are designed to preserve the rural lifestyle we currently enjoy:

1. Move traffic efficiently through and/or around our community. To help route traffic from proposed local developments to the highways more efficiently, we support extending Citracado Avenue from the proposed Escondido Research and Technology Center to I-15, and completing the extension of Twin Oaks Road from Rancho Santa Fe Road to SR 78, with any necessary widening. Further, we recommend that the extension of Country Club Drive (sc1375) be removed from the county circulation element, as this would provide a short-cut through our community from grid-locked Del Dios Highway to SR 78. We ask that any major (east-west or north-south) arterial road not be located in our community, as this would disrupt our fragile riparian environment, degrade our sensitive habitats, and fragment our 100-year-old neighborhoods.
2. Institute traffic calming measures on our residential roads. Towards this end, we recommend downgrading to residential roads our current local collector roads, Country Club Drive and Kauana Loa, and establishing the reduced residential speed limits. We wish to have Elfin Forest Road downgraded from the proposed 4 lanes to maintain the current 2 lanes and allow for the possible future addition of a multipurpose pathway trail. We have surveyed the residents of Elfin Forest and over 70% do not want to see Harmony Grove Road or Elfin Forest Road widened. Nearly 20% of our residents work from home. Seventy-seven percent of residents think new roads through Elfin Forest are unwarranted. We support the addition of marked pedestrian/equestrian crossing areas on these roads.
3. To preserve the viewshed of our valley along the Escondido Creek for future generations, we recommend designating Harmony Grove Road and Elfin Forest Road as Scenic Highways.
4. We also ask that new developments not be built until the appropriate road improvements have been constructed.

We hope that you will appreciate our commitment to preserve our rural lifestyle and help us attain these traffic goals.

Sincerely,

Mid Hoppenrath,

Chair, Elfin Forest /Harmony Grove Town Council

Cc : David Graham, Senior Policy Advisor, Supervisor Bill Horn
Doug Dill, San Dieguito Planning Group

*The Escondido Creek Conservancy
P.O. Box 460791
Escondido, California 92046*

July 31, 2004

Ms. Kristin Blackson
County of San Diego
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123-1666

Re: Notice of Preparation for Harmony Grove Village; GPA 04-04, R04-010, P04-012,
P04-014, SP 04-03, tm 5365, LOG NO. 04-08-011

Dear Ms. Blackson:

The Escondido Creek Conservancy (TECC) has reviewed the Notice of Preparation for the proposed Harmony Grove Village development and submits these concerns to be addressed in the project EIR:

Biological Impacts

Analyze all direct and indirect impacts to the biological resources on site. Discuss enhancement of the Escondido Creek and its tributaries as part of the project. Discuss regional impacts with respect to the pair of Golden Eagles which nest just southwest of the project boundaries, but forage on site.

Analyze all off site impacts to biological resources, specifically the proposed bridge across Escondido Creek, the road connection to Avenida del Diablo, the widening of Harmony Grove Road, and any improvements to the creek crossing at Country Club Drive. Detail measures to eliminate and mitigate these impacts.

Water Quality

Analyze impacts to water quality in Escondido Creek and all on site tributaries during the construction phase. Discuss methods to eliminate impacts or measures to mitigate impacts.

Analyze impacts to water quality in Escondido Creek and all on site tributaries during the build out phase. Discuss methods to eliminate impacts and measures to mitigate impacts. Specifically address methods to reduce impervious surfaces, methods to limit pollution of the creeks from animal waste and dust at the equestrian facilities, chemical runoff from parks, play fields and residential lots, and spills at the sewage treatment plant. Include a discussion of plans for disposing of treated water during rainy winter seasons when irrigation is not needed. Describe how solid waste will be stored and transported from the sewage treatment plant in a manner that doesn't impact the creek.

Sewage Treatment Plant

In the event of failure at the proposed Harmony Grove Village Sewer Treatment Plant threatening the health and safety of area residents, analyze the holding capacity and the sewer outfall capacity of the City of Escondido's Hale Avenue Reclamation Facility (HARF). Analyze the ocean outfall sewer line and the need for its expansion further off shore. Analyze the need for construction of a second east to west ocean outfall line to accommodate potential public health and safety issues that accompany the project's density and future increased density on nearby sites.

Analyze the need to create a new special district to provide for the construction, maintenance, upkeep and operation the project's proposed Sewer Treatment Plant. The analysis should identify future boundary lines of any newly formed special district.

Traffic

Analyze traffic generated by the project during construction and build out that could increase pressure to widen Harmony Grove Road or construct SC 1375. Discuss the environmental impacts of these off site infrastructure improvements and methods/mitigation to avoid them.

Recreation

Analyze impacts to local trails systems, the Elfin Forest Recreational Reserve and nearby County open space lands due to increased use by Harmony Grove Village residents. Discuss mitigation measures to soften these impacts. TECC's position is that the Countywide surplus of parkland does not mitigate for impacts to specific recreational resources adjacent to large developments such as Harmony Grove Village.

Schools

Analyze the impact to existing schools, K-12, as well as site identification of lands appropriate for future construction of new schools to accommodate the Harmony Grove Village and projected future growth this project may spawn in the area. This analysis should encompass the boundaries of the Escondido Union School District, the Escondido Union High School District, the San Dieguito Unified School District and the Rancho Santa Fe School District.

Growth Inducement

Analyze potential for proposed project density to encourage further subdivision and increased density on nearby off site lots. Describe measure to prevent this outcome.

Analyze potential for the sewer treatment plant to induce density increases in the surrounding area by providing an alternative to septic. Identify measures to prevent the plant from being expanded to support future off site development.

Project Alternatives

Analyze impacts of the proposed project compared to projects designed to meet current County zoning and a project designed to meet the requirements of the City of Escondido's general plan for this area, prior to de-sphering, as well as a no project alternative.

The Escondido Creek Conservancy appreciates the opportunity to provide input on this project and awaits the EIR.

Sincerely,.

June Rady, President
The Escondido Creek Conservancy
Telephone: 760/746-4713



San Diego County Archaeological Society, Inc.
Environmental Review Committee

3 July 2004

RECEIVED

JUL 07 2004

San Diego County
DEPT. OF PLANNING & LAND USE

To: Ms. Kristin Blackson
Department of Planning and Land Use
County of San Diego
5201 Ruffin Road, Suite B
San Diego, California 92123-1666

Subject: Notice of Preparation of a Draft Environmental Impact Report
Harmony Grove Village
SP 04-03, GPA 04-04, R04-010, TM 5365, P04-012, P04-013, P04-014,
Log No. 04-08-011

Dear Ms. Blackson:


Thank you for the Notice of Preparation for the subject project, received by this Society last week.

We are pleased to note the inclusion of cultural resources in the list of subject areas to be addressed in the DEIR, and look forward to reviewing it during the upcoming public comment period. To that end, please include us in the distribution of the DEIR, and also provide us with a copy of the cultural resources technical report(s).

Please note that the NOP was mailed to me at my home address. Please correct your mailing list so that all future mailings go to P.O. Box 81106, San Diego, CA 92038-1106.

SDCAS appreciates being included in the County's environmental review process for this project.

Sincerely,


James W. Royle, Jr., Chairperson
Environmental Review Committee

cc: SDCAS President
File

10 of 2

HARMONY GROVE VILLAGE;
GPA 04-04, REZ 04-010, P04-012, P04-013,
P04-014, SP 04-03, TM 5365; LOG NO. 04-08-011
NOTICE OF PREPARATION PUBLIC REVIEW PERIOD
July 1, 2004 through August 2, 2004

PUBLIC SCOPING MEETING COMMENT SHEET

MONDAY, JULY 19, 2004
COUNTY OF SAN DIEGO
DEPARTMENT OF LAND USE
5201 RUFFIN ROAD, SUITE B
SAN DIEGO, CA 92123

WRITTEN COMMENT FORM

My Fax Says your Mail Box is
Full and will not except anymore Faxes

2:19 8/2/04

(Attach additional pages as needed)

MAIL, FAX or E-MAIL FORMS TO:

Kristin Blackson
County of San Diego
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123
FAX #: (858) 694-3012
e-mail: kristin.blackson@sdcounty.ca.gov

Steve Anderson 8/2/04
Signature Date

Steve Anderson
Print Name

9508 Harmony Grove Rd
Address

Escondido Ca 92029
City State Zip Code

(760) 747-7669
Phone Number

COMMENTS MUST BE RECEIVED BY 4:00 PM, AUGUST 2, 2004

1) My concern is that my neighbors and me are going to subsidize your equestrian friendly village. I bought this property three years ago, since then the county has proposed a half mile equestrian trail through my property. You are stealing my privacy and my property. I did not buy this private property so the country can steal it from me and give it to the residents of NW Village.

1) A community in Oceanside that borders the 110 acre Calavera Preserve in Carlsbad has a problem with coyotes. Their solution was to kill them! Your village is surrounded by 1000's of acres of with coyotes and mountain lions. How soon will it be before the Fish and Game wardens start to kill our wildlife. It is a waste of tax payer's money to buy a preserve and then allow a village to be developed next to it.

2) The private equestrian ranch south of the village, is this part of N.U.W. open space? I understand this property is under litigation? If this is true and they lose, does this change the density of the village?

3) I have 49 acres in Harmony Grove, about 22 acres south of Harmony Grove Road and 27 acres north of the road. I do drive my tractor across Harmony Grove Road on many occasions.

4) With two major pad cuts now showing next to Wilgen Road (old map states 1/unit per 4, new map shows 16 units) looks as you state one thing and do another! Common sense tells me the oak trees on the back side of this hill will surely die.

5) You are going to subject the spiritual retreat, the whole valley, and beyond with your equestrian loud speakers. This will be unacceptable.

6) "Your scenic view" I am no longer interested in preserving my property. Your equestrian trail up Wilgen road will be next to my motorcycle trail. Your houses will be over looking my paintball field and race track. Drive down Harmony Grove Road and you will see so many "No Trespassing" signs it will make you think, "What is this guy hiding.", Sound extreme? So does your village plan.

Steve Anderson
8/2/04

HARMONY GROVE VILLAGE;
GPA 04-04, REZ 04-010, P04-012, P04-013,
P04-014, SP 04-03, TM 5365; LOG NO. 04-08-011
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MONDAY, JULY 19, 2004
COUNTY OF SAN DIEGO
DEPARTMENT OF LAND USE
5201 RUFFIN ROAD, SUITE B
SAN DIEGO, CA 92123

RECEIVED
AUG 03 2004
San Diego County
DEPT. OF PLANNING & LAND USE

WRITTEN COMMENT FORM

See attached comments. They represent how I feel
about all my concerns regarding The Harmony Grove
Village

(Attach additional pages as needed)

MAIL, FAX or E-MAIL FORMS TO:

Kristin Blackson
County of San Diego
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123
FAX #: (858) 694-3012
e-mail: kristin.blackson@sdcounty.ca.gov

Donna Beckett
Signature Date
Donna Beckett
Print Name
2844 Country Club Dr.
Address
Escondido Ca 92029
City State Zip Code
760 480-7815
Phone Number

COMMENTS MUST BE RECEIVED BY 4:00 PM, AUGUST 2, 2004

Comments on NOP of the Environmental Impact Report 2004

San Diego County
DEPT. OF PLANNING & LAND USE

July 28, 2004

In general we know this project is overwhelming to the community, violates all aspects of our community character, and is in conflict with every goal this community has ever set for itself.

We find the overall size of the project, the densities, and the total number of resulting residences will result in permanent immitigable impacts to a severely constrained valley with limited access.

The community of Harmony Grove has worked hard to preserve the surrounding hills and open spaces, involving itself in the purchase of a nearby preserve, which is a long established nesting site for Golden Eagles. Several of the community members are active in The Escondido Creek Conservancy (TECC), which traverses the valley floor.

Part I: Aesthetics

Page 12, 13, Part C: The report states that there will be an average of 6153 cubic yards per acre of cut and fill involved in this project. The severe density increases of this project would require this dramatic reconfiguration of the valley floor and adjacent hillsides. The report calls this a "potentially significant impact" when in fact it is a significant immitigable impact that will forever alter the character and configuration of the valley.

Page 13 Part D: The report states that the project "will create a substantial source of nighttime light or glare which would adversely affect day or nighttime views in the area" and concludes that this is a "less than significant impact". The report calls this less than a significant impact when in fact our community claimed it's dark night skies as a prime issue in the quality of life to our residents and was a major point of our community character in our comments to the GP2020 process. Several of our residents live in homes in the hills overlooking the valley floor where this ambient light will radiate in to those properties. The report seems to reflect a standard of concern based upon whether or not the light created by this project would affect the Palomar Observatory some forty miles away. Our concern is for the degradation of the night skies in the valley and to potential effect on the behavior of the abundant local wildlife including coyotes, eagles, hawks, owls, and mountain lions, and other nocturnal creatures that reside in and around the valley.

Part II: Agricultural Resources

Page 14 Part A: The report states the project will convert locally unique agricultural lands and states this will be a significant impact. This is actually an immitigable impact due to the total loss of all agricultural activity in the valley. There is no plan to mix this use into this project. We request this option be studied under an alternative plan. The current agricultural uses, egg ranches and diaries, would not necessarily be the future agricultural activity in the valley. For example, the valley used to have vineyards. There are several other potential agricultural uses that could be compatible with residential mixed use.

Part III: Air Quality: The report states there may be a significant impact to the air quality during construction, having a concern for diesel exhaust and other construction activities. Not only will there be significant immitigable impact to this geographically constrained valley with limited air flow from the construction phase, but the over 9000 average daily trips (ADT) created by the over seven hundred homes constructed by this project cannot be mitigated. An alternative plan should be studied that would dramatically reduce the number of homes built by this project so as to reduce the ADT's not only during construction but when the project is complete.

Part IV: Biological Resources: Harmony Grove residents place high value on the diverse biological resources of the valley and the surrounding hills. Not only will this project have significant impact to those resources and wetlands on the project property itself, it will result in a dramatic increase in human recreational activity in the surrounding hills and preserves. For example, several environmental groups, community groups, and The County of San Diego, combined efforts to purchase a nearby 345-acre parcel for preserve. The primary motivation was the historic nesting sites of Golden Eagles on this land. These large raptors require lands for foraging well beyond this 345-acre parcel and they are known to hunt on lands within the boundaries of this project and surrounding properties. This project will be an immitigable impact that will result in the disappearance and/or conflict with area wildlife. Some of these conflicts will be hazardous to humans and wildlife. An alternative plan should be considered that would significantly reduce the size of this project in order to have less of an impact on these resources, both on and off site.

Part D: The report states that potential wildlife corridors exist throughout the project site. An alternative plan should be considered that would significantly reduce the size of the project so as to preserve what local residents know are existing wildlife corridors through and around the project property.

Part VII: Hazards and Hazardous Materials: The report states there is a potentially significant impact because of the presence of an onsite sewer treatment plant and the possibility of an accidental release of hazardous materials from this facility. If an event of this type were to occur there would be no mitigation possible. There should also be study as to possible ground water contamination from a facility in such a constrained valley not only from a possible accidental release but also from ongoing irrigation with affluent from this facility. Keep in mind there are numerous residences in the valley, or downstream from the project, that are dependent on wells. There should be study of

alternative plan that would reduce the size of this project to the point where an on site sewer treatment, and it's related hazards, would not be necessary.

Part VII: Hydrology and Water Quality: The report states that there is a potentially significant impact to groundwater quality and the residents also have a concern for run-off of recycled affluent, used to irrigate open space landscaping, chronically running into the Escondido Creek and affecting the creek's overall health. The ongoing efforts of TECC and individual residents, over the past several years, have resulted in improved natural conditions along this unique watershed. Several environmental organizations, including TECC, have combined their efforts to oversee the health of the entire length of the Escondido Creek watershed and these organizations recently received a 3.5 million dollar grant to remove non-native vegetation in the watershed. An alternative plan should be studied that would reduce the size of this project so that an onsite sewer treatment plant would not be necessary.

Part IX: Land Use and Planning: The report asks whether the project is in conflict with an applicable land use plan, policy, or regulation, of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect. The history of this project, with questionable gerrymandering designed to avoid the growth management and general plans in complete opposition of the project results in the question being answered with a resounding "YES!" This project is in conflict with every plan except for the financial plans of New Urban West, the applicant. In spite of the County's GP2020 plan tentatively showing zoning compatible with the project, several questionable decisions were made to reach this point. One in particular was the LAFCO decision to remove the area of the project from the sphere of influence of the City of Escondido thereby taking Escondido's general plan growth management law known as Proposition S out of the process. An alternative plan, with Proposition S as part of the process, should be studied that begins at the existing zoning under the City of Escondido's general plan. This would reveal a history of community based planning that has occurred in Harmony Grove for the past several years. It would also reveal how the current project is in complete conflict with community character and future desires of the community.

Part XI: Noise Impacts: The report states that noise generated from the project is a potential significant impact. From the residents of Harmony Groves' viewpoint, this will be an immitigable impact. This valley is a tightly constrained valley with shear granite formations an all sides that cause noise to be held in the valley. On a quiet morning one can hear normal conversations from over a mile away because of the formations and valley topography. The noise from the increase in vehicular traffic alone will forever alter the valley's semi-rural character. The presence of the Harmony Grove Spiritualists Retreat, established in the 1890's, is of special significance and sets the tone for the valley in that these residents are here primarily for the peace and quiet, not unlike almost every other resident in the valley. An alternative plan should be studied that gives the auditory peace of this community the respect that it deserves.

Part XII: Population and Housing (Growth Inducing Impact): The report asks if this project would induce substantial population growth in the area, either directly or indirectly, by either the new homes and businesses created by this project or by the growth inducing extension of roads and other infrastructure. This has been the contention of the majority of thinking residents of this community since the project was first proposed. There is no mechanism (equity transfers) in the project or in GP2020, except zoning, which seems merely a formality in County planning, that protects the valley from further like projects. In fact the project's planned roads and infrastructure have evolved into an impersonal maze that will lead to more of the same. The project is, essentially, disguised sprawl. Several Harmony Grove residents have met personally with New Urban West executives and asked pointed questions in order to establish their stated commitment to the preservation of open space around their project. We asked that they show their commitment by considering the purchase of some of the downzoned parcels near their project in order to commit these parcels to open space preserve. New Urban West made it very clear they would not consider this. An alternative plan should be studied that would have mechanisms and mitigation that would create true dedicated open space of sufficient quantity to preserve the wildlife present in the valley and surrounding hills and end the current land speculation that is occurring with parcels not involved in this project.

Part XV: Transportation and Traffic: The report asks if the project will result in a substantial increase in traffic on existing streets and states this is a potential significant impact. There is no doubt this project will create at least 9000 ADT's and will overwhelm the current two lane road system. There will be new roads of a type that will forever change the character of the community. They will contribute to an already chronic speeding problem and make the community less walk able rather than more as promised by New Urban West. The possibility of SC1375 being built, connecting Country Club Dr. to Del Dios Hwy. and traversing lands dedicated to preserve, is becoming more a reality as this project progresses. Although this project may not, in itself, trigger SC1375, the reality will not be too many more EIR's in the future. The report discusses a new road from the project, through the quarry site, across Escondido Creek, and connecting to Avenida Del Diablo in Escondido, a residential street. Not only will this impact Harmony Grove in an immitigable fashion, but also it will now dump a large portion of the ADT's onto Escondido's residential streets. If this project is allowed to proceed as is, New Urban West should at least be required to connect its ingress and egress to a street designed to handle this level of service. New Urban West should be held accountable for the traffic that will be created by their project and be required to participate in the extension/completion of Citracado Pkwy. A better solution would be to study and accept an alternative that would not create the number of ADT's that so significantly impact local roads. There is not even any discussion of alternative transportation in this report and no resources or infrastructure committed to public transportation. The design of the roads within and around the project is of concern.

There seems to have been a complete departure of any creativity in this area. The community would like to see smaller more walk able streets that encourage lower vehicular speeds. Could the local fire department be brought on board to encourage this type of development by committing to future purchase of smaller equipment that would be compatible with this type of roadway system?

There is also concern for the traffic created on Country Club Dr. south from Harmony Grove Rd. to the new proposed equestrian facility. With the events being discussed for this property shouldn't an improved crossing of Escondido Creek be built for Country Club Dr.? Currently the area south of the creek on Country Club Dr. is landlocked due to roadway flooding during average winter rains. The proposed level of activity is too great for this inadequate crossing, with it's inherent dangerous flooding, that seems to constantly tempt drivers to cross under marginal conditions.

CONCLUSION:

This project is too large, too dense, and results in too many homes being built in a constrained valley that is adjacent to, and in some cases, in critical habitat. This report mentions that the area is "ripe for development". This may be true, but does it have to be over-development? Does it have to blow up community character so thoroughly? New Urban West's project will result in the area of a half a billion dollars in gross profit from the ultimate sale of the homes in this project. How much wealth does the County of San Diego need to hand to this out-of-town developer at the costs of the quality of life of those residents who live here now? Can a project half this size be done with fewer impacts, more open space, and preserve some reasonable net income for New Urban West?

This valley should always be viewed in context to being adjacent to the urban areas of San Marcos and Escondido and should be a transition area from those urban centers to the surrounding areas of open space preserves. A truly semi-rural community would be the appropriate build out for Harmony Grove. New Urban West and the County of San Diego have used the process of GP2020 to manipulate buzz words like "clustering", "village concept", "downzones", "up zones", and "equity mechanisms", to manipulate and cloak more of the same urban sprawl into Harmony Grove. This NOP also makes it clear that this project will foster the long standing practice of not holding developers responsible for needed infrastructure for the projects they build, leaving the taxpayer to foot the bill in the future for the big ticket items, like, in this case, the extension of Citracado Pkwy from the Escondido Technology Park in Quail Hills across Escondido Creek to Del Dios Hwy.

This project is filled with too many immitigable impacts and an alternative should be studied to significantly reduce it's size, density, and quantity of units, to something more in line with current zoning, either under current County general plan or City of Escondido general plan.

HARMONY GROVE VILLAGE;
GPA 04-04, REZ 04-010, P04-012, P04-013,
P04-014, SP 04-03, TM 5365; LOG NO. 04-08-011
NOTICE OF PREPARATION PUBLIC REVIEW PERIOD
July 1, 2004 through August 2, 2004

PUBLIC SCOPING MEETING COMMENT SHEET

MONDAY, JULY 19, 2004
COUNTY OF SAN DIEGO
DEPARTMENT OF LAND USE
5201 RUFFIN ROAD, SUITE B
SAN DIEGO, CA 92123

WRITTEN COMMENT FORM

Am looking forward to the evolving project. Although traffic is a concern, we believe narrow, winding country roads, as they exist, will best dissuade traffic from our roads & put it on Citracado & other main arteries.

Hopefully the General Plan can be amended to speed the completion of the Village & our trails

(Attach additional pages as needed)

Kathy DaSilva 7-19-04
Signature Date

KATHY DASILVA
Print Name

MAIL, FAX or E-MAIL FORMS TO:

Kristin Blackson
County of San Diego
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123
FAX #: (858) 694-3012
e-mail: kristin.blackson@sdcounty.ca.gov

2573 KANANA LOMA
Address

HARMONY GROVE CA 92029
City State Zip Code

760 432 6061
Phone Number

COMMENTS MUST BE RECEIVED BY 4:00 PM, AUGUST 2, 2004

HARMONY GROVE VILLAGE;
GPA 04-04, REZ 04-010, P04-012, P04-013,
P04-014, SP 04-03, TM 5365; LOG NO. 04-08-011
NOTICE OF PREPARATION PUBLIC REVIEW PERIOD
July 1, 2004 through August 2, 2004
PUBLIC SCOPING MEETING COMMENT SHEET

MONDAY, JULY 19, 2004
COUNTY OF SAN DIEGO
DEPARTMENT OF LAND USE
5201 RUFFIN ROAD, SUITE B
SAN DIEGO, CA 92123

WRITTEN COMMENT FORM

After reading the "comment on NUW NOP" I wholeheartedly agree to a few points, including:

1. Nighttime light should be limited. Dark skies are a natural resource that can and should be preserved.
2. Noise impacts from traffic are unacceptable. Noise must be addressed and mitigation provided.
3. Growth Inducing Impact: Open space should be purchased and dedicated to reduce risk of further urban sprawl.
4. If the above issues cannot be satisfactorily mitigated, fewer units should be allowed.

(Attach additional pages as needed)

MAIL, FAX or E-MAIL FORMS TO:

Kristin Blackson
County of San Diego
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123
FAX #: (858) 694-3012
e-mail: kristin.blackson@sdcounty.ca.gov

Kevin N. Davis 8-1-04
Signature Date

Kevin N. Davis
Print Name

2761 Kauana Loa Drive
Address

Escondido CA 92029
City State Zip Code
(760) 480-8631
Phone Number

P04-014, SP 04-03, TM 5365; LOG NO. 04-08-011
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I agree with the majority of points made in
the "Comments on NUW NOP".

The noise and light pollution factors are what
will be of most importance to me. We are here
for the dark skies at night and would not want
to see the skies lit up at night by street or
traffic lights. And the less traffic the better. We
already have issues with people constantly running
the stop sign on Country Club Dr. & Kavana. Loa Dr.
The fewer homes built the happier we will be.

(Attach additional pages as needed)

 8-1-04
Signature Date

Susan E. Davis
Print Name

MAIL, FAX or E-MAIL FORMS TO:

Kristin Blackson
County of San Diego
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123
FAX #: (858) 694-3012
e-mail: kristin.blackson@sdcounty.ca.gov

2761 Kavana Loa Dr.
Address

Escondido, CA. 92029
City State Zip Code

760 480-8631
Phone Number

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Blackson, Kristin

From: James Day [pigshead@mac.com]
Sent: Monday, August 02, 2004 10:18 AM
To: Blackson, Kristin
Subject: Harmony Grove Village Scoping Meeting Comments

Dear Ms Blackson,

The following are our comments regarding the Environmental Impact Report that will be prepared for the proposed Harmony Grove Village development.

We have been living at 2905 Harmony Grove Road for a year now, in the spot where the equestrian facilities are to be built. Our belief is that we are in a unique position to communicate the current condition of Harmony Grove and how this proposed planned community might affect the area.

Our first and foremost concern is the orientation of access roads and the traffic patterns that will result as a consequence of this development. Harmony Grove Road is a winding country road on either end of the proposed development site, with pronounced "rush-hour" conditions west-bound in the morning and east-bound in the afternoon. The natural tendency of these commuters is to accelerate drastically when they encounter the only flat straightaway of the route; this is the stretch between Country Club Drive and the curve just after the entrance to the egg ranch. We have witnessed many accidents owing to a "bottleneck" that is created when east-bound afternoon traffic comes out of this sharp curve and is forced to stop for someone making a left turn at the ranch. While the proposed addition of a middle turning lane is a slight step in the right direction, we feel the overall width and alignment of the road is already wholly inadequate for present traffic levels, even before the addition of 730 homes to the valley. A doubling of the width of Harmony Grove Road out to Hale in the east, with stoplights at Kauana Loa, Enterprise, Howard, and Hale would be a neccessity of this new development.

The inadequate width and alignment of Harmony Grove Road is the greater dilemma. Our great fear is that in the event of another fire, the residents of Elfin Forest with their horse-trailers in tow would be sandwiched between traffic snags at San Elijo to the west and Harmony Grove Village to the east, preventing their flight to safety. An extremely costly widening of Harmony Grove Road west of the Village all the way to San Elijo would probably have to be done.

In the year that we have lived along the Escondido Creek floodplain, we have seen incredible amounts of wildlife seldom seen in urbanized portions of the county. While we are not scientists, we are certain that these populations would be negatively affected by the development of this planned community. We have seen coyotes, ducks, herons, finches, egrets, turkey vultures, hawks, gophers, possum, lizards, all kinds of fantastically-colored spiders, chipmunks, and squirrels. We have seen birds which a guide to local birds has termed "rare." We have heard various owls and types of bullfrogs. The pastures which surround our house seem to be a small remaining patch of what seems to be an ever-decreasing amount of open, inland valley floors, that land developers find so lucrative, but are also vital to many species of wildlife.

If you have any questions regarding our comments or concerns, please do not hesitate to respond to this address or to call us at 760-745-4514. We would welcome an opportunity to personally show you or any of your colleagues our area.

Sincerely,

James A. Day and Kara L. Young

HARMONY GROVE VILLAGE;
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① Traffic will be a significant problem -
Please require wide roads with bike
lanes.

request
for plan Through traffic should not have to go
through the village - There should be
a road around their project.

② Why make zoning maps if they
can be so violated by individual
land owners?

(Attach additional pages as needed)

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Kristin Blackson
County of San Diego
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123
FAX #: (858) 694-3012
e-mail: kristin.blackson@sdcounty.ca.gov

Elizabeth M. Keithley 7/19/04
Signature Date

Elizabeth M. Keithley
Print Name

15518 E. Forest Rd
Address

Escondido CA 92229
City State Zip Code

Phone Number

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Please see attached sheet

(Attach additional pages as needed)

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County of San Diego
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123
FAX #: (858) 694-3012
e-mail: kristin.blackson@sdcounty.ca.gov

Kellane C McMillen 7-25-04
Signature Date

DIANE C MC MILLEN
Print Name

1498 COUNTRY CLUB DR
Address

ESCONDIDO CA 92029
City State Zip Code

760-489-9802
Phone Number

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SAN DIEGO, CA 92123

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See Attached Sheet.

(Attach additional pages as needed)

MAIL, FAX or E-MAIL FORMS TO:

Kristin Blackson
County of San Diego
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123
FAX #: (858) 694-3012
e-mail: kristin.blackson@sdcounty.ca.gov

James C McMiller 7/15/04
Signature Date

James C McMiller
Print Name

1498 County Club DR
Address

ESL CA 92029
City State Zip Code

760-717-9802
Phone Number

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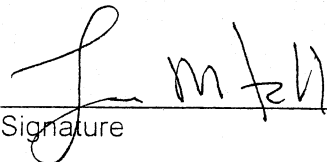
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SAN DIEGO, CA 92123

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Please see attached comments
on NOP of an EIR 2004

(Attach additional pages as needed)

 7-27-04
Signature Date

Laura Mitchell

Print Name

MAIL, FAX or E-MAIL FORMS TO:

Kristin Blackson
County of San Diego
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123
FAX #: (858) 694-3012
e-mail: kristin.blackson@sdcounty.ca.gov

2842 Country Club Dr
Address

Escondido CA 92029

City State Zip Code

760 745-9819

Phone Number

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please see attached

(Attach additional pages as needed)

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County of San Diego
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123
FAX #: (858) 694-3012
e-mail: kristin.blackson@sdcounty.ca.gov

Velma Ann Beck-Witte 7/19/04
Signature Date

Velma Ann Beck-Witte
Print Name
owner of 5 acre parcel in Harmony Grove
13343 Floral Ave
Address
Poway CA 92064
City State Zip Code

Phone Number

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Comments on NOP of the Environmental Impact Report 2004

July 28, 2004

In general we know this project is overwhelming to the community, violates all aspects of our community character, and is in conflict with every goal this community has ever set for itself.

We find the overall size of the project, the densities, and the total number of resulting residences will result in permanent immitigable impacts to a severely constrained valley with limited access.

The community of Harmony Grove has worked hard to preserve the surrounding hills and open spaces, involving itself in the purchase of a nearby preserve, which is a long established nesting site for Golden Eagles. Several of the community members are active in The Escondido Creek Conservancy (TECC), which traverses the valley floor.

Part I: Aesthetics

Page 12, 13, Part C: The report states that there will be an average of 6153 cubic yards per acre of cut and fill involved in this project. The severe density increases of this project would require this dramatic reconfiguration of the valley floor and adjacent hillsides. The report calls this a "potentially significant impact" when in fact it is a significant immitigable impact that will forever alter the character and configuration of the valley.

Page 13 Part D: The report states that the project "will create a substantial source of nighttime light or glare which would adversely affect day or nighttime views in the area" and concludes that this is a "less than significant impact". The report calls this less than a significant impact when in fact our community claimed it's dark night skies as a prime issue in the quality of life to our residents and was a major point of our community character in our comments to the GP2020 process. Several of our residents live in homes in the hills overlooking the valley floor where this ambient light will radiate in to those properties. The report seems to reflect a standard of concern based upon whether or not the light created by this project would affect the Palomar Observatory some forty miles away. Our concern is for the degradation of the night skies in the valley and to potential effect on the behavior of the abundant local wildlife including coyotes, eagles, hawks, owls, and mountain lions, and other nocturnal creatures that reside in and around the valley.

Part II: Agricultural Resources

due to the total loss of all agricultural activity in the valley. There is no plan to mix this use into this project. We request this option be studied under an alternative plan. The current agricultural uses, egg ranches and diaries, would not necessarily be the future agricultural activity in the valley. For example, the valley used to have vineyards. There are several other potential agricultural uses that could be compatible with residential mixed use.

Part III: Air Quality: The report states there may be a significant impact to the air quality during construction, having a concern for diesel exhaust and other construction activities. Not only will there be significant immitigable impact to this geographically constrained valley with limited air flow from the construction phase, but the over 9000 average daily trips (ADT) created by the over seven hundred homes constructed by this project cannot be mitigated. An alternative plan should be studied that would dramatically reduce the number of homes built by this project so as to reduce the ADT's not only during construction but when the project is complete.

Part IV: Biological Resources: Harmony Grove residents place high value on the diverse biological resources of the valley and the surrounding hills. Not only will this project have significant impact to those resources and wetlands on the project property itself, it will result in a dramatic increase in human recreational activity in the surrounding hills and preserves. For example, several environmental groups, community groups, and The County of San Diego, combined efforts to purchase a nearby 345-acre parcel for preserve. The primary motivation was the historic nesting sites of Golden Eagles on this land. These large raptors require lands for foraging well beyond this 345-acre parcel and they are known to hunt on lands within the boundaries of this project and surrounding properties. This project will be an immitigable impact that will result in the disappearance and/or conflict with area wildlife. Some of these conflicts will be hazardous to humans and wildlife. An alternative plan should be considered that would significantly reduce the size of this project in order to have less of an impact on these resources, both on and off site.

Part D: The report states that potential wildlife corridors exist throughout the project site. An alternative plan should be considered that would significantly reduce the size of the project so as to preserve what local residents know are existing wildlife corridors through and around the project property.

Part VII: Hazards and Hazardous Materials: The report states there is a potentially significant impact because of the presence of an onsite sewer treatment plant and the possibility of an accidental release of hazardous materials from this facility. If an event of this type were to occur there would be no mitigation possible. There should also be study as to possible ground water contamination from a facility in such a constrained valley not only from a possible accidental release but also from ongoing irrigation with affluent from this facility. Keep in mind there are numerous residences in the valley, or downstream from the project, that are dependent on wells. There should be study of alternative plan that would reduce the size of this project to the point where an on site sewer treatment, and it's related hazards, would not be necessary.

Part VII: Hydrology and Water Quality: The report states that there is a potentially significant impact to groundwater quality and the residents also have a concern for run-off of recycled affluent, used to irrigate open space landscaping, chronically running into the Escondido Creek and affecting the creek's overall health. The ongoing efforts of TECC and individual residents, over the past several years, have resulted in improved natural conditions along this unique watershed. Several environmental organizations, including TECC, have combined their efforts to oversee the health of the entire length of the Escondido Creek watershed and these organizations recently received a 3.5 million dollar grant to remove non-native vegetation in the watershed. An alternative plan should be studied that would reduce the size of this project so that an onsite sewer treatment plant would not be necessary.

Part IX: Land Use and Planning: The report asks whether the project is in conflict with an applicable land use plan, policy, or regulation, of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect. The history of this project, with questionable gerrymandering designed to avoid the growth management and general plans in complete opposition of the project results in the question being answered with a resounding "YES!" This project is in conflict with every plan except for the financial plans of New Urban West, the applicant. In spite of the County's GP2020 plan tentatively showing zoning compatible with the project, several questionable decisions were made to reach this point. One in particular was the LAFCO decision to remove the area of the project from the sphere of influence of the City of Escondido thereby taking Escondido's general plan growth management law known as Proposition S out of the process. An alternative plan, with Proposition S as part of the process, should be studied that begins at the existing zoning under the City of Escondido's general plan. This would reveal a history of community based planning that has occurred in Harmony Grove for the past several years. It would also reveal how the current project is in complete conflict with community character and future desires of the community.

Part XI: Noise Impacts: The report states that noise generated from the project is a potential significant impact. From the residents of Harmony Groves' viewpoint, this will be an immitigable impact. This valley is a tightly constrained valley with shear granite formations an all sides that cause noise to be held in the valley. On a quiet morning one can hear normal conversations from over a mile away because of the formations and valley topography. The noise from the increase in vehicular traffic alone will forever alter the valley's semi-rural character. The presence of the Harmony Grove Spiritualists Retreat, established in the 1890's, is of special significance and sets the tone for the valley in that these residents are here primarily for the peace and quiet, not unlike almost every other resident in the valley. An alternative plan should be studied that gives the auditory peace of this community the respect that it deserves.

Part XII: Population and Housing (Growth Inducing Impact): The report asks if this project would induce substantial population growth in the area, either directly or indirectly, by either the new homes and businesses created by this project or by the growth inducing extension of roads and other infrastructure. This has been the contention of the majority of thinking residents of this community since the project was first proposed. There is no mechanism (equity transfers) in the project or in GP2020, except zoning, which seems merely a formality in County planning, that protects the valley from further like projects. In fact the project's planned roads and infrastructure have evolved into an impersonal maze that will lead to more of the same. The project is, essentially, disguised sprawl. Several Harmony Grove residents have met personally with New Urban West executives and asked pointed questions in order to establish their stated commitment to the preservation of open space around their project. We asked that they show their commitment by considering the purchase of some of the downzoned parcels near their project in order to commit these parcels to open space preserve. New Urban West made it very clear they would not consider this. An alternative plan should be studied that would have mechanisms and mitigation that would create true dedicated open space of sufficient quantity to preserve the wildlife present in the valley and surrounding hills and end the current land speculation that is occurring with parcels not involved in this project.

Part XV: Transportation and Traffic: The report asks if the project will result in a substantial increase in traffic on existing streets and states this is a potential significant impact. There is no doubt this project will create at least 9000 ADT's and will overwhelm the current two lane road system. There will be new roads of a type that will forever change the character of the community. They will contribute to an already chronic speeding problem and make the community less walk able rather than more as promised by New Urban West. The possibility of SC1375 being built, connecting Country Club Dr. to Del Dios Hwy. and traversing lands dedicated to preserve, is becoming more a reality as this project progresses. Although this project may not, in itself, trigger SC1375, the reality will not be too many more EIR's in the future. The report discusses a new road from the project, through the quarry site, across Escondido Creek, and connecting to Avenida Del Diablo in Escondido, a residential street. Not only will this impact Harmony Grove in an immitigable fashion, but also it will now dump a large portion of the ADT's onto Escondido's residential streets. If this project is allowed to proceed as is, New Urban West should at least be required to connect its ingress and egress to a street designed to handle this level of service. New Urban West should be held accountable for the traffic that will be created by their project and be required to participate in the extension/completion of Citracado Pkwy. A better solution would be to study and accept an alternative that would not create the number of ADT's that so significantly impact local roads. There is not even any discussion of alternative transportation in this report and no resources or infrastructure committed to public transportation. The design of the roads within and around the project is of concern. There seems to have been a complete departure of any creativity in this area. The community would like to see smaller more walk able streets that encourage lower

vehicular speeds. Could the local fire department be brought on board to encourage this type of development by committing to future purchase of smaller equipment that would be compatible with this type of roadway system?

There is also concern for the traffic created on Country Club Dr. south from Harmony Grove Rd. to the new proposed equestrian facility. With the events being discussed for this property shouldn't an improved crossing of Escondido Creek be built for Country Club Dr.? Currently the area south of the creek on Country Club Dr. is landlocked due to roadway flooding during average winter rains. The proposed level of activity is too great for this inadequate crossing, with it's inherent dangerous flooding, that seems to constantly tempt drivers to cross under marginal conditions.

CONCLUSION:

This project is too large, too dense, and results in too many homes being built in a constrained valley that is adjacent to, and in some cases, in critical habitat. This report mentions that the area is "ripe for development". This may be true, but does it have to be over-development? Does it have to blow up community character so thoroughly? New Urban West's project will result in the area of a half a billion dollars in gross profit from the ultimate sale of the homes in this project. How much wealth does the County of San Diego need to hand to this out-of-town developer at the costs of the quality of life of those residents who live here now? Can a project half this size be done with fewer impacts, more open space, and preserve some reasonable net income for New Urban West?

This valley should always be viewed in context to being adjacent to the urban areas of San Marcos and Escondido and should be a transition area from those urban centers to the surrounding areas of open space preserves. A truly semi-rural community would be the appropriate build out for Harmony Grove. New Urban West and the County of San Diego have used the process of GP2020 to manipulate buzz words like "clustering", "village concept", "downzones", "up zones", and "equity mechanisms", to manipulate and cloak more of the same urban sprawl into Harmony Grove. This NOP also makes it clear that this project will foster the long standing practice of not holding developers responsible for needed infrastructure for the projects they build, leaving the taxpayer to foot the bill in the future for the big ticket items, like, in this case, the extension of Citracado Pkwy from the Escondido Technology Park in Quail Hills across Escondido Creek to Del Dios Hwy.

This project is filled with too many immitigable impacts and an alternative should be studied to significantly reduce it's size, density, and quantity of units, to something more in line with current zoning, either under current County general plan or City of Escondido general plan.

HARMONY GROVE VILLAGE;
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DEPARTMENT OF LAND USE
5201 RUFFIN ROAD, SUITE B
SAN DIEGO, CA 92123

RECEIVED
AUG 06 2004

DEPT. OF PLANNING & LAND USE

WRITTEN COMMENT FORM

1. How will this development effect the rural atmosphere and small community character of Elfin Forest/Harmony Grove?
2. What impact will this have on traffic on Elfin Forest Road? Are there plans to install stop signs/roundabouts at major intersections (ie Fortuna Del Este and Fortuna Del Sur) so vehicles and horses can safely cross and/or enter/exit onto Elfin Forest Rd? This development will obviously dramatically increase traffic as ~~people use~~ residents of Harmony Grove Village drive west to jobs, beaches, shopping, etc.
(Attach additional pages as needed)

Lori Vitale July 30 2004
Signature Date

Lori Vitale
Print Name

20751 Fortuna Del Norte
Address

Elfin Forest CA 92029
City State Zip Code

760 752 7868
Phone Number

MAIL, FAX or E-MAIL FORMS TO:

Kristin Blackson
County of San Diego
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123
FAX #: (858) 694-3012
e-mail: kristin.blackson@sdcounty.ca.gov

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3. Under current County Standards City 1.5 units and be built on this property. How is it that New Urban West can by-pass the regulations that are applied to the surrounding residents and be allowed to build 742 dwellings, equestrian center AND retail space?
4. Will current building standards for Elfin Forest / Harmony Grove be revised so higher density building will be allowed and we will no longer be a rural community?
5. How will this development effect the local creek, wildlife and animal habitats?
6. The Elfin Forest / Harmony Grove Community has a "dark sky" policy. How will this development change that policy? will white or yellow lights light up the sky?

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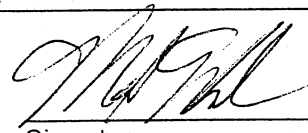
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Traffic along Harmony Grove Road is
a major concern. The road is not
wide enough and is severely congested
towards the Auto Park. I live on
H.G. Road and have seen fatalities
on the road. There is also a power
plant/industrial park being built
as well. Traffic is already
very congested. Please address
traffic and safety.

(Attach additional pages as needed)

 J-1969
Signature Date

Mark Weider
Print Name

MAIL, FAX or E-MAIL FORMS TO:

Kristin Blackson
County of San Diego
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123
FAX #: (858) 694-3012
e-mail: kristin.blackson@sdcounty.ca.gov

2467 Harmony Grove Road
Address
Escondido CA 92029
City State Zip Code
760 743-3140
Phone Number

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San Diego County
DEPT. OF PLANNING & LAND USE

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Please see attached comments,
(ie. 5 page letter)

(Attach additional pages as needed)

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Kristin Blackson
County of San Diego
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123
FAX #: (858) 694-3012
e-mail: kristin.blackson@sdcounty.ca.gov

Frank A. McCulloch 7-29-04
Signature Date

Frank A. McCulloch
Print Name

3146 Cordrey Lane
Address

Escondido CA 92029
City State Zip Code

760-743-3175
Phone Number

COMMENTS MUST BE RECEIVED BY 4:00 PM, AUGUST 2, 2004

HARMONY GROVE VILLAGE;
GPA 04-04, REZ 04-010, P04-012, P04-013,
P04-014, SP 04-03, TM 5365; LOG NO. 04-08-011
NOTICE OF PREPARATION PUBLIC REVIEW PERIOD
July 1, 2004 through August 2, 2004

PUBLIC SCOPING MEETING COMMENT SHEET

MONDAY, JULY 19, 2004
COUNTY OF SAN DIEGO
DEPARTMENT OF LAND USE
5201 RUFFIN ROAD, SUITE B
SAN DIEGO, CA 92123

RECEIVED
AUG 03 2004

San Diego County
DEPT. OF PLANNING & LAND USE

WRITTEN COMMENT FORM

Please see attached comments.
(ie 5 page letter)

(Attach additional pages as needed)

MAIL, FAX or E-MAIL FORMS TO:

Kristin Blackson
County of San Diego
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123
FAX #: (858) 694-3012
e-mail: kristin.blackson@sdcounty.ca.gov

Pat M^cCulloch 7-30-04
Signature Date

Pat M^cCulloch
Print Name

3146 Cordway Ln.
Address

Escondido Ca 92029
City State Zip Code

760-743-3175
Phone Number

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Traffic !!! Please see attached comments.
Country Club bridge !!! (i.e. Spageletter)
Creek !!

(Attach additional pages as needed)

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Cindy Perkins
Signature Date

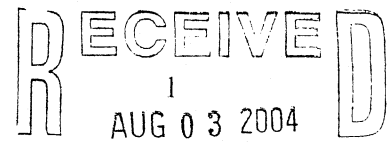
Cindy Perkins
Print Name

3140 Ardrey Ln
Address

Escondido CA 92029
City State Zip Code

(760) 741-2273
Phone Number

COMMENTS MUST BE RECEIVED BY 4:00 PM, AUGUST 2, 2004



Comments on NOP of the Environmental Impact Report
Harmony Grove Village

San Diego County
DEPT. OF PLANNING & LAND USE

July 28, 2004

In general we know this project is overwhelming to the community, violates all aspects of our community character, and is in conflict with every goal this community has ever set for itself.

We find the overall size of the project, the densities, and the total number of resulting residences will result in permanent immitigable impacts to a severely constrained valley with limited access.

The community of Harmony Grove has worked hard to preserve the surrounding hills and open spaces, involving itself in the purchase of a nearby preserve, which is a long established nesting site for Golden Eagles. Several of the community members are active in The Escondido Creek Conservancy (TECC), which traverses the valley floor.

Part I: Aesthetics

Page 12, 13, Part C: The report states that there will be an average of 6153 cubic yards per acre of cut and fill involved in this project. The severe density increases of this project would require this dramatic reconfiguration of the valley floor and adjacent hillsides. The report calls this a "potentially significant impact" when in fact it is a significant immitigable impact that will forever alter the character and configuration of the valley.

Page 13 Part D: The report states that the project "will create a substantial source of nighttime light or glare which would adversely affect day or nighttime views in the area" and concludes that this is a "less than significant impact". The report calls this less than a significant impact when in fact our community claimed it's dark night skies as a prime issue in the quality of life to our residents and was a major point of our community character in our comments to the GP2020 process. Several of our residents live in homes in the hills overlooking the valley floor where this ambient light will radiate in to those properties. The report seems to reflect a standard of concern based upon whether or not the light created by this project would affect the Palomar Observatory some forty miles away. Our concern is for the degradation of the night skies in the valley and to potential effect on the behavior of the abundant local wildlife including coyotes, eagles, hawks, owls, and mountain lions, and other nocturnal creatures that reside in and around the valley.

Part II: Agricultural Resources

Page 14 Part A: The report states the project will convert locally unique agricultural lands and states this will be a significant impact. This is actually an immitigable impact due to the total loss of all agricultural activity in the valley. There is no plan to mix this

use into this project. We request this option be studied under an alternative plan. The current agricultural uses, egg ranches and diaries, would not necessarily be the future agricultural activity in the valley. For example, the valley used to have vineyards. There are several other potential agricultural uses that could be compatible with residential mixed use.

Part III: Air Quality: The report states there may be a significant impact to the air quality during construction, having a concern for diesel exhaust and other construction activities. Not only will there be significant immitigable impact to this geographically constrained valley with limited air flow from the construction phase, but the over 9000 average daily trips (ADT) created by the over seven hundred homes constructed by this project cannot be mitigated. An alternative plan should be studied that would dramatically reduce the number of homes built by this project so as to reduce the ADT's not only during construction but when the project is complete.

Part IV: Biological Resources: Harmony Grove residents place high value on the diverse biological resources of the valley and the surrounding hills. Not only will this project have significant impact to those resources and wetlands on the project property itself, it will result in a dramatic increase in human recreational activity in the surrounding hills and preserves. For example, several environmental groups, community groups, and The County of San Diego, combined efforts to purchase a nearby 345-acre parcel for preserve. The primary motivation was the historic nesting sites of Golden Eagles on this land. These large raptors require lands for foraging well beyond this 345-acre parcel and they are known to hunt on lands within the boundaries of this project and surrounding properties. This project will be an immitigable impact that will result in the disappearance and/or conflict with area wildlife. Some of these conflicts will be hazardous to humans and wildlife. An alternative plan should be considered that would significantly reduce the size of this project in order to have less of an impact on these resources, both on and off site.

Part D: The report states that potential wildlife corridors exist throughout the project site. An alternative plan should be considered that would significantly reduce the size of the project so as to preserve what local residents know are existing wildlife corridors through and around the project property.

Part VII: Hazards and Hazardous Materials: The report states there is a potentially significant impact because of the presence of an onsite sewer treatment plant and the possibility of an accidental release of hazardous materials from this facility. If an event of this type were to occur there would be no mitigation possible. There should also be study as to possible ground water contamination from a facility in such a constrained valley not only from a possible accidental release but also from ongoing irrigation with affluent from this facility. Keep in mind there are numerous residences in the valley, or downstream from the project, that are dependent on wells. There should be study of alternative plan that would reduce the size of this project to the point where an on site sewer treatment, and it's related hazards, would not be necessary.

Part VII: Hydrology and Water Quality: The report states that there is a potentially significant impact to groundwater quality and the residents also have a concern for run-off of recycled affluent, used to irrigate open space landscaping, chronically running into the Escondido Creek and affecting the creek's overall health. The ongoing efforts of TECC and individual residents, over the past several years, have resulted in improved natural conditions along this unique watershed. Several environmental organizations, including TECC, have combined their efforts to oversee the health of the entire length of the Escondido Creek watershed and these organizations recently received a 3.5 million dollar grant to remove non-native vegetation in the watershed. An alternative plan should be studied that would reduce the size of this project so that an onsite sewer treatment plant would not be necessary.

Part IX: Land Use and Planning: The report asks whether the project is in conflict with an applicable land use plan, policy, or regulation, of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect. The history of this project, with questionable gerrymandering designed to avoid the growth management and general plans in complete opposition of the project results in the question being answered with a resounding "YES!" This project is in conflict with every plan except for the financial plans of New Urban West, the applicant. In spite of the County's GP2020 plan tentatively showing zoning compatible with the project, several questionable decisions were made to reach this point. One in particular was the LAFCO decision to remove the area of the project from the sphere of influence of the City of Escondido thereby taking Escondido's general plan growth management law known as Proposition S out of the process. An alternative plan, with Proposition S as part of the process, should be studied that begins at the existing zoning under the City of Escondido's general plan. This would reveal a history of community based planning that has occurred in Harmony Grove for the past several years. It would also reveal how the current project is in complete conflict with community character and future desires of the community.

Part XI: Noise Impacts: The report states that noise generated from the project is a potential significant impact. From the residents of Harmony Groves' viewpoint, this will be an immitigable impact. This valley is a tightly constrained valley with shear granite formations an all sides that cause noise to be held in the valley. On a quiet morning one can hear normal conversations from over a mile away because of the formations and valley topography. The noise from the increase in vehicular traffic alone will forever alter the valley's semi-rural character. The presence of the Harmony Grove Spiritualists Retreat, established in the 1890's, is of special significance and sets the tone for the valley in that these residents are here primarily for the peace and quiet, not unlike almost every other resident in the valley. An alternative plan should be studied that gives the auditory peace of this community the respect that it deserves.

Part XII: Population and Housing (Growth Inducing Impact): The report asks if this project would induce substantial population growth in the area, either directly or indirectly, by either the new homes and businesses created by this project or by the growth inducing extension of roads and other infrastructure. This has been the contention of the majority of thinking residents of this community since the project was first proposed. There is no mechanism (equity transfers) in the project or in GP2020, except zoning, which seems merely a formality in County planning, that protects the valley from further like projects. In fact the project's planned roads and infrastructure have evolved into an impersonal maze that will lead to more of the same. The project is, essentially, disguised sprawl. Several Harmony Grove residents have met personally with New Urban West executives and asked pointed questions in order to establish their stated commitment to the preservation of open space around their project. We asked that they show their commitment by considering the purchase of some of the downzoned parcels near their project in order to commit these parcels to open space preserve. New Urban West made it very clear they would not consider this. An alternative plan should be studied that would have mechanisms and mitigation that would create true dedicated open space of sufficient quantity to preserve the wildlife present in the valley and surrounding hills and end the current land speculation that is occurring with parcels not involved in this project.

Part XV: Transportation and Traffic: The report asks if the project will result in a substantial increase in traffic on existing streets and states this is a potential significant impact. There is no doubt this project will create at least 9000 ADT's and will overwhelm the current two lane road system. There will be new roads of a type that will forever change the character of the community. They will contribute to an already chronic speeding problem and make the community less walk able rather than more as promised by New Urban West. The possibility of SC1375 being built, connecting Country Club Dr. to Del Dios Hwy. and traversing lands dedicated to preserve, is becoming more a reality as this project progresses. Although this project may not, in itself, trigger SC1375, the reality will not be too many more EIR's in the future. The report discusses a new road from the project, through the quarry site, across Escondido Creek, and connecting to Avenida Del Diablo in Escondido, a residential street. Not only will this impact Harmony Grove in an immitigable fashion, but also it will now dump a large portion of the ADT's onto Escondido's residential streets. If this project is allowed to proceed as is, New Urban West should at least be required to connect its ingress and egress to a street designed to handle this level of service. New Urban West should be held accountable for the traffic that will be created by their project and be required to participate in the extension/completion of Citracado Pkwy. A better solution would be to study and accept an alternative that would not create the number of ADT's that so significantly impact local roads. There is not even any discussion of alternative transportation in this report and no resources or infrastructure committed to public transportation. The design of the roads within and around the project is of concern. There seems to have been a complete departure of any creativity in this area. The community would like to see smaller more walk able streets that encourage lower vehicular speeds. Could the local fire department be brought on board to encourage this

type of development by committing to future purchase of smaller equipment that would be compatible with this type of roadway system?

There is also concern for the traffic created on Country Club Dr. south from Harmony Grove Rd. to the new proposed equestrian facility. With the events being discussed for this property shouldn't an improved crossing of Escondido Creek be built for Country Club Dr.? Currently the area south of the creek on Country Club Dr. is landlocked due to roadway flooding during average winter rains. The proposed level of activity is too great for this inadequate crossing, with it's inherent dangerous flooding, that seems to constantly tempt drivers to cross under marginal conditions.

CONCLUSION:

This project is too large, too dense, and results in too many homes being built in a constrained valley that is adjacent to, and in some cases, in critical habitat. This report mentions that the area is "ripe for development". This may be true, but does it have to be over-development? Does it have to blow up community character so thoroughly? New Urban West's project will result in the area of a half a billion dollars in gross profit from the ultimate sale of the homes in this project. How much wealth does the County of San Diego need to hand to this out-of-town developer at the costs of the quality of life of those residents who live here now? Can a project half this size be done with fewer impacts, more open space, and preserve some reasonable net income for New Urban West?

This valley should always be viewed in context to being adjacent to the urban areas of San Marcos and Escondido and should be a transition area from those urban centers to the surrounding areas of open space preserves. A truly semi-rural community would be the appropriate build out for Harmony Grove. New Urban West and the County of San Diego have used the process of GP2020 to manipulate buzz words like "clustering", "village concept", "downzones", "up zones", and "equity mechanisms", to manipulate and cloak more of the same urban sprawl into Harmony Grove. This NOP also makes it clear that this project will foster the long standing practice of not holding developers responsible for needed infrastructure for the projects they build, leaving the taxpayer to foot the bill in the future for the big ticket items, like, in this case, the extension of Citracado Pkwy from the Escondido Technology Park in Quail Hills across Escondido Creek to Del Dios Hwy.

This project is filled with too many immitigable impacts and an alternative should be studied to significantly reduce it's size, density, and quantity of units, to something more in line with current zoning, either under current County general plan or City of Escondido general plan.